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Person Responsible	
Approval/Review Body	ELAS / Senior Leadership Team
Frequency of Review*	12 months

*Policies will be reviewed more frequently if legal changes or good practice require

Purpose

Oracle is committed to the highest levels of ethical conduct and integrity in all that we do. We adopt a zero tolerance approach towards bribery, fraud and corruption in any form.

The aim of this policy is to outline the company's approach to preventing and prohibiting bribery, fraud and corruption in accordance with the Bribery Act 2010.

Scope

This policy applies to all employees and directors of the company, and to temporary workers, consultants, contractors, and agents acting for, or on behalf of, the company ("associated persons") within the UK.

Oracle's senior managers are committed to implementing effective measures to prevent, monitor and eliminate bribery. However, it is also the responsibility of all employees and associated persons to assist Oracle in the prevention, detection and reporting of bribery, corruption, and / or fraud.

Principles

- Oracle will not tolerate any form of bribery, fraud or corruption and is committed to the rigorous investigation of any such occurrence.
- Where acts of bribery, fraud or corruption are proven, Oracle will ensure that it is dealt with appropriately and will also take relevant steps to recover any losses in full.
- Gifts and hospitality must only be received or offered in line with the rules set out in this policy and procedure.
- It is the responsibility of all employees, and associated persons, to report any reasonable suspicions of fraud and corruption and it is Oracle's policy that an employee should not suffer as a result of reporting reasonably held suspicions and there must be no unlawful discrimination on any grounds. Employees are encouraged to raise concerns under the Oracle Whistleblowing Policy.

Policy & Procedure

Bribery

A bribe can be defined as the offer, promise, giving, accepting or soliciting of a payment or benefit to a person intended as a reward or inducement to act contrary to the proper exercise of their duty, good faith or impartiality.

A bribe can take the form of:

- The direct or indirect promise, offering or authorisation of anything of value;
- The offer or receipt of any kickback, loan, fee or other advantage; or
- The giving of aid, donations or voting designed to exert improper influence.
- Under the Bribery Act there are four possible offences relating to bribery:

1. **Bribing another person**

The company prohibits the offering, promising or giving of a reward (whether cash or any other incentive) to induce a person or company to perform a relevant function or activity improperly or as a reward for improper activity. This could be in order to gain any commercial, contractual or regulatory advantage for company in a way which is considered unethical.

2. **Being bribed**

The company prohibits the accepting of, agreeing or requesting of a reward in return for performing a relevant function or acting improperly.

A relevant function includes any activity of a public nature or any activity connected to a business.

The company will consider the employee, or associated person, to have acted improperly where they are in breach of what a reasonable person within the UK would expect in relation to the performing of the function or activity, even if the function or activity is not taking place in the UK.

3. **Bribing a foreign public official**

The company prohibits any attempt to influence a foreign public official with the intention of obtaining or retaining business in a situation where the public official was not permitted or required by law to be influenced.

4. **Failure to prevent bribery**

The company will endeavour to stop people who are operating on its behalf from being involved in bribery.

Bribery is a criminal offence and carries with it criminal penalties. This can be up to ten years imprisonment and an unlimited fine for any individual and an unlimited fine for the company.

Fraud and corruption

Fraud and corruption cover a wide range of irregularities and illegal acts, all of which are categorised by intentional deception. This includes theft, dishonesty, deceitful behaviour, bribery, forgery, extortion, conspiracy, embezzlement, misappropriation, false representation and concealment of material facts and collusion. Fraud can range from falsifying expenses and overtime claims, stealing monies or items, using Oracle property and time for private use (without authorisation), to receiving bribes or inducements.

Where fraud is suspected or has occurred, we will carry out prompt and thorough investigations. Anyone found to be involved in fraudulent activity will have disciplinary action taken against them, which may result in dismissal.

Facilitation payments

Facilitation payments are sometimes used by businesses to secure or expedite the performance of a routine or necessary action to which the payer has a legal or other entitlement. However facilitation payments may trigger an offence under the Bribery Act and it is very important that employees or associated persons act with great vigilance when dealing with such requests.

Corporate entertainment, gifts, hospitality and promotional expenditure

A gift is considered to be any item, cash or goods or any services which are offered to an individual at no cost to them or at any cost which is less than its commercial value.

Hospitality is considered to be entertainment offered to an individual at no cost or at a cost that is less than its commercial value. For example, drinks receptions, dinner invitations or corporate hospitality at an event.

The company will permit corporate entertainment, gifts, hospitality and promotional expenditure that are undertaken for the following purposes:

- To establish or maintain a good business relationship
- To improve the image and reputation of the company
- To present the company's goods or services effectively.

This is on the provision that it is arranged in good faith and is not offered, promised or accepted to secure an advantage for the company or any of its associated persons to influence the impartiality of the recipient.

The company will only authorise reasonable, appropriate and proportionate entertainment and promotional expenditure in line with the following guidance>

Accepting gifts

Oracle understands that in the course of day-to-day business some employees may be offered gifts of significant value. Employees, or associated persons, must not accept offers of gifts from individuals or companies with whom Oracle currently, or might in the near future, conduct business with, except for gifts of a token nature or of relatively insignificant value (i.e. less than £25, such as diaries, calendars or promotional material). Employees or associated persons should never put themselves in a position where they could be accused of taking bribes or inducements for personal gain. Employees or associated persons, should talk to their line manager if they are unclear as to what is acceptable.

If an employee or associated person is offered a gift of over £25 then this should be raised with their line manager and a director. The offer will be logged in the gifts and hospitality register and the appropriate course of action will be expressly communicated to the individual.

Giving or offering gifts

Oracle recognises that as well as receiving gifts, some employee, or associated persons may be required to offer gifts to third parties, including clients and suppliers, in order to maintain good working relationships.

Prior approval from the Finance Director must be obtained before any employee or associated person, can offer a gift to a third party. It is the responsibility of each Director to ensure all authorised gifts are recorded in the company gift and hospitality register.

Accepting hospitality

There may be some circumstances where hospitality is offered to events which will promote Oracle's interests and Oracle recognises that external networking for some departments is a core part of their work.

Personal invitations to non-work related, non-Oracle events involving corporate hospitality, offered or given by any supplier, client, business contact or potential contractor, must be notified to the individual's line manager. If the hospitality has a commercial value of more than £500 authorisation must be sought from a Director. The Director is responsible for ensuring the offer of hospitality is logged in the gifts and hospitality register regardless of whether or not it is authorised.

Giving or offering hospitality

Oracle recognises that as well as accepting hospitality some employees, or associated persons, may be required to offer hospitality to third parties, including customers and suppliers, in order to maintain good working relationships and to retain and obtain business.

With the exception of a working lunch or refreshments during a meeting with third parties, prior approval from a director must be sought before any employee, or associated persons, can offer hospitality to a third party. Where such hospitality is more than described above, the director must obtain authorisation from the CEO. If the hospitality is authorised then it is the responsibility of the board director requesting the authorisation to ensure it is recorded in the company gift and hospitality register.

Political and charitable contributions

Europa does not allow political contributions in any form whether to political parties, causes or to support candidates. The appointment of any politician or former politician as a consultant, employee or officer of the Company requires approval by the board and is subject to applicable laws.

Questions

Any questions regarding this policy should be directed to your Line Manager