

ANTI-BRIBERY POLICY

JUNE 2020



SA GROUP
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1. ANTI-BRIBERY STATEMENT

1.1 SA Group Ltd needs to maintain our clients' and business partners' confidence in the integrity of the services that we provide and of the individuals that represent us. We are, therefore, committed to carrying out business fairly, openly and honestly and we have a "zero tolerance" approach to bribery.

2. DEFINITIONS OF BRIBERY OFFENCES

2.1 The Bribery Act 2010 makes it an offence for a person to offer, promise or give a financial or other advantage to another person, where the person offering the advantage:

- intends the advantage to bring about the improper performance by another person of a relevant function or activity or to reward such improper performance; or
- knows or believes that the acceptance of the advantage offered, promised or given in itself constitutes the improper performance of a relevant function or activity.

2.2 The Act also creates an offence of Bribery of a Foreign Public Official. This offence is committed where a person offers, promises or gives a financial or other advantage to a foreign public official with the intention of influencing the official in the performance of their official functions.

2.3 A commercial organisation will be liable to prosecution under the Act if a person associated with it bribes another person intending to obtain or retain business or an advantage in the conduct of business for that organisation. The commercial organisation will have a full defence if it can show that despite a particular case of bribery it nevertheless had adequate procedures in place to prevent persons associated with it from bribing.

2.4 A person associated with a commercial organisation is defined as a person who 'performs services' for or on behalf of the organisation. This person can be an individual or an incorporated or unincorporated body. Where a supplier can properly be said to be performing services for a commercial organisation rather than simply acting as the seller of goods, it may also be an 'associated' person.

3. IMPLEMENTATION OF ANTI-BRIBERY POLICY

3.1 Anti-bribery measures implemented by the company will be proportionate to the assessed risk and to the size of the company.

4. RISK ASSESSMENT

4.1 SA Group Ltd is a small company that conducts its business in the UK and undertakes the majority of its work for the Ministry of Defence and the major UK defence companies. The typical value of individual contracts is not large and the employees and suppliers that perform services on behalf of the Company all hold National Security Clearances, which they need to maintain in order to work in this sector. The risk of bribery is therefore assessed as low.

5. EMPLOYEES

5.1 The Company reserve the right not to employ individuals who have been convicted of an offence under the Bribery Act or have been dismissed from previous employment for accepting or offering a bribe.

5.2 The Company's Disciplinary Procedure categorises accepting or offering a bribe as an offence of gross misconduct. Under this procedure, dismissal is the normal sanction for an offence of gross misconduct.

6. SUPPLIERS

6.1 The Company reserve the right to not let contracts for work on its behalf to suppliers who have been convicted of offences under the Bribery Act.

6.2 Clauses will be included in all contracts for work on the Company's behalf such that suppliers will commit to a zero tolerance of bribery and to cascade the same condition down to their suppliers. These contracts will define in detail the basis of remuneration, including expenses, and the criteria under which hospitality may be provided on behalf of SA Group Ltd.

7. DONATIONS

7.1 The Company will not make donations to political parties or charities that are directly linked to obtaining new business or gaining a business advantage.

8. COMMUNICATION AND TRAINING

8.1 This policy will be made available to all employees via the Company's intranet (SiP) and to external organisations upon request.

8.2 References to this policy will be included in the Company's Staff Handbook.

8.3 Employees will be made aware of this policy as part of the induction process and when changes to it are introduced.

9. MONITORING AND REVIEW

9.1 This policy will be reviewed at least annually and also:

- when the circumstances described in the risk assessment change;
- when changes are made to any applicable legislation;

- when required by the Corrective Action or Preventive Action (CAPA) processes of the quality management system.



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