

## CIM Anti-Bribery Policy

The following Anti-Bribery Policy states our intentions and commitment to comply with the Act and to take every reasonable measure to operate and to carry out business in an open, honest and fair manner.

We will do this by:

- Complying with legislation.
- Adopting a zero tolerance policy to bribery and corruption.
- Training employees to ensure they understand the requirements of the UK Bribery Act 2010.
- Ensuring that we have in place adequate procedures to prevent the risk of bribery and corruption within the company and among any of its customers, suppliers and partners.
- Ensuring that all necessary arrangements are in place to aid compliance and to investigate any reports made in accordance with the Policy.
- Adopting the approach that it is better not to do business at all than to risk doing corrupt business.
- Ensuring that no employee will suffer any adverse consequences as a result of reporting any suspicion of bribery or corruption.
- Ensuring that everyone who is employed by or performs services for or on behalf of CIM, including agency workers and contractors are bound by the Policy. Intermediaries and other business partners are expected to act ethically and should be required to comply with the Policy in all their dealings with or for CIM.
- Monitoring the giving and receiving of gifts and entertainment and ensuring that approval procedures are understood and complied with.
- Reviewing the Policy regularly to ensure its effectiveness, taking in to account any feedback and queries.
- Compliance with the Policy needs to be throughout CIM, employees and business partners wherever they work within our business are expected and required to comply with this Policy.
- Compliance with the Policy does not mean that CIM cannot entertain its customers, suppliers and partners to get to know them better in the ordinary course of business. It means that entertainment needs to be appropriate and relevant.
- Gifts may still be given or received where custom dictates, however they should be at an appropriate level. When giving or receiving gifts or entertainment, it must be done without the intention of the recipient then being subjected to improper influence by a provider.
- Employees should contact the Company Secretary if they have any questions about the Act or the Policy and escalate the matter up to the CIM Directors if they feel it is appropriate to do so.
- Overall responsibility for this policy rests with the CIM Directors.



**Director**

**06.01.2022**