



smigroupuk.com



01428 658 333



hello@smigroupuk.com



Anti Bribery, Fraud and Corruption Policy

Department:	ESG
Policy Owner:	ESG Manager
Approved Date:	September 2023
Date for Renewal:	September 2023
Version Number:	Version 1.1

1.1 Purpose:

SMI has a zero-tolerance policy towards bribery, fraud, and corruption and third parties must never engage in such practices.

SMI are committed to the prevention, deterrence and detection of fraud, bribery, and all other corrupt business practices.

1.2 Statement of Intent:

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising, or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Bribes are not always a matter of handing over cash. Gifts, hospitality, and entertainment can be bribes if they are intended to influence a decision.

Intentional misrepresentation or concealment of the truth to secure something of value for SMI will not be carried out by a director or employee, aligning with The Fraud Act 2006.

Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

1.3 Principles of the Policy:

SMI prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- **to or from** any person or company wherever located, whether a public official or public body, or a private person or company.
- **by** any individual employee, director, agent, consultant, contractor or other person or body acting on the firm's behalf.
- **to** gain any commercial, contractual, or regulatory advantage for the firm in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- normal hospitality if it complies with the firms' Corporate Entertainment Policy.
- fast tracking a process which is available to all on the payment of a fee; and/or
- providing resources to assist a person or body to decide more efficiently if it is for this purpose only.

SMI guidelines and procedures implemented across the business prevent, detect, and respond to fraudulent activities, different forms of fraudulent include:

- embezzlement, bribery, falsifying records, and theft.

Communication and training about SMI's fraud policy involves regular training sessions and distribution of relevant materials ensuring employees understand the policy and their responsibilities.

1.4 Employee responsibility and how to raise a concern:

The prevention, detection and reporting of bribery, fraud or corruption is the responsibility of all employees throughout SMI. If a member of staff becomes aware or suspects that an activity or conduct which is proposed or has taken place is a bribe or corrupt, they have a duty to report this.

It may not always be a simple matter to determine whether a possible course of action is appropriate. If a member of staff is in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to their Manager or Head of Department. If necessary, guidance should also be sought from the Group Legal and Compliance Director or the Director, Head of Legal.

SMI will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

1.5 Penalties:

The Bribery Act 2010 comes into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the SMI is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the firm.

The penalties for a business committing fraud can vary depending on the jurisdiction and the severity of the fraudulent activity.

1.6 Key risk areas:

1.7

Bribery can be a risk in many areas of the firm. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment, and hospitality: can be used to exert improper influence on decision makers. Gifts, entertainment, and hospitality are acceptable provided they fall within the firm's Corporate Entertainment Policy.
- Facilitation payments: are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The firm will not tolerate or excuse such payments being made.
- Reciprocal agreements: or any other form of 'quid pro quo' are never acceptable unless they are

legitimate business arrangements which are properly documented and approved by management. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.

Failure to report a related concern or breach of this policy will constitute grounds for termination by SMI.

1.6 Monitoring and reviewing:

SMI’s upper management, consisting of our Environmental, Social and Governance Manager and Directors will review compliance with our policy annually, with any changes needed actioned efficiently.

1.6 Signature:

Elizabeth Mellor
Environmental, Social and Governance Manager



1.8 Further information:

The key legislation and or sources of global best practice that SMI align with, providing a coherent and consistent framework to enable SMI to understand and implement arrangement enabling compliance include:

- UK Fraud Act 2006
- UK Anti-Terrorism, Crime & Security Act 2001
- UK Combined Code on Corporate Governance
- UK Money Laundering Regulations 2007
- UK Bribery Act 2010

1.8 Version Control:

Version:	Detail:	Approved by:	Date:
1.0	First Issue following policy introduction and annual reviews	Paul Prisgrove	May 2019
1.1	Review and updated key risk areas and regulations.	ESG Manager	Last approved 2023

