



# BLUEFAN GROUP

**Bluefan Group Ltd**

## General Statement of intent: Anti-Bribery & Corruption

**This policy must be reviewed by the following Date:**

**11/03/2022**

<b>Company Name</b>	<b>Signed by</b>	<b>Review due date</b>
Bluefan Group Ltd	Laurence Green	11/03/2022

## General Statement of intent: Anti-Bribery & Corruption

It is the Policy of the Bluefan Group Ltd to ensure that our business is conducted according to ethical, professional, and legal standards in a fair, honest, and open manner.

Bluefan Group Ltd has a zero-tolerance approach to all forms of bribery and corruption which include:

- The direct or indirect promise, offering or authorisation of anything of value.
- The offer or receipt of any kickback, loan, fee, reward, or other advantage.
- The giving of aid, donations or voting designed to exert improper influence.
- Payments for lavish or inappropriate entertainment or travel.
- Favours including offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

Bluefan Group Ltd opposes all forms of bribery and corruption, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

To adhere to the policy, we will:

- Ensure all Company personnel are provided with training on the Bluefan Group Ltd Company Policy on anti-bribery and corruption so they can recognise the signs and take steps to avoid it.
- Encourage employees, subcontractors, and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our Company 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment.
- Understand how bribery may occur during the Bluefan Group Ltd operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence.
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Constantly monitor and regularly review this Anti-Bribery and Corruption Policy to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all employees.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

**Approved by:** Laurence Green

**Job Role:** Director

**Signed:** *Laurence Green*

15/3/2021

Company Name	Signed by	Review due date
Bluefan Group Ltd	Laurence Green	11/03/2022