

FRAUD, ANTI-BRIBERY AND CORRUPTION POLICY



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**FRAUD, ANTI-BRIBERY AND
CORRUPTION POLICY**

Version 1 01/08/2023
Next Review 01/08/2024

Fraud, Anti-Bribery and Corruption Policy

Introduction

The purpose of the Fraud, Anti-bribery and Corruption Policy is to set out the responsibilities of ELA and those who work for us in regard to observing and upholding our zero-tolerance position on fraud, bribery and corruption. We have full regard for the Bribery Act 2010.

Responsibility

The Managing Director has ultimate responsibility for developing, implementing, and maintaining systems of control to prevent fraud, anti-bribery, and corruption, this includes risk assessment of bribery under the 2010 Act, communicating policies and procedures and reviewing risks.

To assist, the senior leadership team also take responsibility of supporting the development, implementation, and maintenance of systems. ELA adheres to the six principles set out under guidance of the Bribery Act 2010 which are Proportionality, Top Level Commitment, Risk Assessment, Due Diligence, Communication and Monitoring and Review.

ELA understands that the organisation could be liable where someone who performs services for it – like an employee or agent – pays a bribe specifically to get business, keep business, or gain a business advantage for the organisation. This policy applies to all employees as the organisation recognises that fraud, anti-bribery, and corruption is supported by employees at all levels.

As an employee of ELA, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given. All employees and those under our control are equally responsible for the prevention, detection, and reporting of fraud, bribery, and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

Statement

ELA is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure fraud, bribery and corruption is prevented. ELA has zero-tolerance for fraud, bribery, and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.



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We will constantly uphold all laws relating to fraud, anti-bribery, and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

ELA recognises that fraud, bribery, and corruption are punishable by imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify your line manager in the first instance.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. ELA has the right to terminate a contractual relationship with an employee if they breach this policy.

An appropriate Manager or Director will then refer the case to appropriate external authorities which could include the police where appropriate.

Definitions

Fraud - wrongful or criminal deception intended to result in financial or personal gain. A person or thing intended to deceive others, typically by unjustifiably claiming or being credited with accomplishments or qualities.

Bribery - the giving or offering of a bribe for personal or professional reasons.

Corruption - dishonesty or criminal offense undertaken by a person or company entrusted with a position of authority, to acquire illicit benefit or abuse power for one's private gain.



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