



ANTI-BRIBERY AND CORRUPTION POLICY

Definition: Bribery and corruption

Bribery involves offering a financial or other advantage to influence improper conduct, while corruption is the misuse of entrusted power for personal gain. Both acts carry severe legal consequences.

1. Our promise and who it covers

We pride ourselves on our reputation for legal and ethical conduct. We have a zero-tolerance approach to bribery and corruption, committing to fair, professional, and integrity-driven practices in all our business dealings. We enforce robust systems to counteract bribery and corruption.

This policy extends to all PMW employees, including executives, directors, officers, secondees, interns, contractors, and consultants.

2. Expected employee conduct

We prohibit our employees from engaging in activities such as offering gifts, hospitality, or payments to gain or reward business advantages. This includes accepting lavish hospitality, giving gifts to government officials, politicians or political parties, and any actions that could breach this policy.

Employees also must not threaten or retaliate against someone who has refused to commit a bribery offence or has raised concerns under this policy.

3. Employee obligations

Our employees must prevent bribery and report any known or suspected instances. Benefits from bribery are considered proceeds of crime and must be reported to the HR department. Such reports will be passed on to the Police for criminal investigation.

4. Assessing risks

Our team assess the risks of bribery and corruption we may face as a business, especially when considering potential new clients or third-party suppliers. These are reviewed by senior management and, if applicable, updated after discovering a possible offence, a move into a new business sector and/or country, or a significant acquisition or merger to confirm that appropriate preventative measures and controls are or will be implemented.

5. Third parties

The responsibility to prevent bribery extends to third parties acting on our behalf. These 'Associated Persons' may be required to provide information about themselves, and our contracts with them include anti-bribery terms.

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6. Additional considerations - payments and charitable donations

We strictly prohibit facilitation payments, 'backhanders', and unofficial payments. Employees must ensure payments are proportionate to goods or services, request receipts, and carefully consider charitable donations. Personal donations are permitted (provided they do not facilitate criminal or terrorist organisations), but political donations are not. All business and charity donations require approval from our Managing Director.

7. Potential third-party red flags

Reportable scenarios involving third parties include improper business practices, bribery reputations, insistence on upfront payments, requests that we must employ their friend or relative in exchange for business, requests for cash and/or refusal to sign a formal commission or fee agreement, or provide an invoice or receipt for payment made, demands for (or offers of) lavish entertainment or gifts before or during working with us, and unusual invoicing practices (asking for payment to a different country etc.).

8. Failure to comply

Violation of this policy is considered gross misconduct, leading to disciplinary action, including potential dismissal. We may also terminate relationships with third parties found in breach.

9. Record keeping

Our finance department keeps detailed records of financial transactions, gifts, hospitality, and expenses, including those related to third parties. All expense claims relating to hospitality, gifts or payments to Third Parties should be submitted following our Expenses Policy and record the reason for expenditure.

10. Training

All staff are given training on this policy (what is and isn't acceptable) at the point of onboarding. We also hold refresher sessions sporadically throughout each financial year.

11. Guidance and protection

Our staff are encouraged to seek guidance if uncertain about any arrangement with our HR department, and we are committed to supporting those who report concerns in good faith - ensuring protection against detrimental treatment.

12. Key contacts

For any inquiries or questions regarding this policy, please reach out to the HR department as the initial point of contact. Additionally, you can contact the Managing Director or a member of the leadership team.

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