

Anti-Bribery & Corruption Policy

pad Design Ltd commits to carrying out all activities within the company in an honest and ethical manner. The practice takes a zero-tolerance approach to dealing with bribery and corruption and expects that all employees, i.e. staff whether permanent, fixed term or temporary, volunteers as well as those contracted to carry out work for pad Design, act in the correct manner.

pad Design will ensure that all business transactions and activities stay within the guidelines as set out in the Bribery Act 2010.

Bribery and Corruption – Definitions

- Bribery is defined as offering, promising, agreeing to receive or giving of a financial or other advantage to induce or reward improper functions or activities and/or the request or receipt of such an advantage.
- Corruption is a form of dishonesty or criminal activity undertaken by a person or organization entrusted with a position of authority, often to acquire illicit benefit. Corruption may include many activities including bribery and embezzlement.

pad Design prohibits any employee from carrying out any of the following activities:

- Receiving payments, gifts or benefits in the expectation that the giver will receive an improper business advantage.
- Providing or promising to provide a gift such as payment or benefit in exchange, in the hope that pad Design will gain a business advantage.
- Undertaking any activity that leads to a breach of this policy or the Bribery Act 2010.
- Undertaking any activity that threatens employees who raise concerns about activities that breach this Anti-Bribery and Corruption Policy.

Responsibilities

- pad Design will ensure that this Anti-Bribery and Corruption Policy is regularly reviewed to make sure that the information contained within remains correct and suitable.
- pad Design will carry out an Anti-Bribery and Corruption risk assessment that is applicable to the size and activity of the company's current position.