



Anti-Bribery Statement

July 2024

For

Richardson BE Distributors Ltd

The Business Centre
Morley Carr Road
Low Moor
Bradford
BD12 0RA

Date 01/07/2024

AMENDMENTS RECORD

General

Amendments to this document must be approved before release. The person making the amendment is to complete the table below, so that a record can be kept of the status of the document.

Comments

Comments by staff as to the content & any suggested improvements should be addressed to Management in the first instance.

Amendment number	Amended by	Date amended	Approved By
002		10/3/23	
003	MN	01/07/24	SR

This document defines & establishes our Anti-Bribery statement within Richardson BE Distribution Limited. It provides details of the organisation and the arrangements for anti-bribery issues currently in operation.

Review of this policy will be made when:

- There are changes to the anti-bribery statement structure
- There are changes to the business name
- Changes are made to any of the safety arrangements
- The activities of the business change significantly

The company Director for Richardson BE Distribution Limited is

Steven Richardson

The contact details are:

Richardson BE Distributors Ltd

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Statement of Intent

It is the statement of intent of Richardson BE Distribution Limited to comply with Anti-Bribery legislation applicable to our undertakings and to regard these as the minimum requirement.

Richardson BE Distribution Limited is committed to the safety and well-being of all persons who may undertake work at Richardson BE Distributors Ltd (please refer to the Health and Safety Policy).

Richardson BE Distribution Limited Health and Safety representative is Steven Richardson.

Richardson BE Distribution Limited undertakes to revise this statement as often as future developments in anti-bribery legislation deems appropriate.

Signed:



Steven Richardson
Director

Date: 01/07/2024

Anti Bribery and Corruption Policy

For Richardson Business Equipment Distributors Ltd

1. Introduction

Richardson Business Equipment Distributors Ltd values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the firm's staff as well as others acting on the firm's behalf, are key to maintaining these standards.

The purpose of this document is to set out the firm's policy in relation to bribery and corruption. The policy applies strictly to all employees, directors, agents, consultants, contractors and to any other people or bodies associated with Richardson Business Equipment Distributors Ltd, within all regions, areas and functions.

2. Understanding and recognising bribery and corruption

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

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.

3. Penalties

The Bribery Act 2010 came 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 firm 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.

4. Richardson Business Equipment Distributors Ltd Policy

Richardson Business Equipment Distributors Ltd will not tolerate bribery or corruption in any form.

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

- *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 *to*, director, agent, consultant, contractor or other person or body acting on the firm's behalf
- *In order 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, provided that it complies with the firm's Corporate Entertainment Policy
- Fast tracking a process which is available to all on the payment of a fee
- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are 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 your Head of Department. If necessary, guidance should also be sought from the company's Legal Advisor.

The firm 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.

5. Key risk areas

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.

Actions by third parties for which the firm may be held responsible: can include a range of people, i.e. agents, contractors and consultants, acting on the firm's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.

Record keeping: can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent.

6. Employee responsibility and how to raise a concern

The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.

Any such incidents should be reported to Steven Richardson, Director

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