

**anti-bribery
and
corruption.**



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Etch Creative
320 Garratt Lane
Earlsfield London
SW18 4EJ

Anti-Bribery and Corruption statement

POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

GIFTS, INVITATIONS & HOSPITALITY

This policy does not prohibit normal and appropriate hospitality (given and received) to or from Third Parties. Staff are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- It is made with the intention of influencing a Third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- It is given in your name and not in the name of the Company;
- It includes cash or a cash equivalent (such as gift certificates or vouchers);
- It is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process); and it is given secretly and not openly.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

STAFF RESPONSIBILITIES

- It is not acceptable for any staff member to:
 - Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
 - Give, promise to give, or offer, a payment, gift or hospitality to a Public Official or Third Party to 'facilitate' or expedite a routine procedure;
 - Accept payment from a Third Party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
 - Accept a gift or hospitality from a Third Party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
 - threaten or retaliate against another Employee who has refused to commit a bribery offence or who has raised concerns under this policy; or

- Engage in any activity that might lead to a breach of this policy or perceived breach of this policy.

- All accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book'.
- All Gifts, Invitations & Hospitality according to Company practice accepted or offered, must be declared
- Expense claims relating to Gifts, Invitations & Hospitality or expenses incurred to Third Parties are specifically recorded the reason for the expenditure.
- The prevention, detection and reporting of any form of Bribery & Corruption are the responsibility of all Employees. A director must be notified as soon as possible if you are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.
- All Employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.
- Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Matthew Anstiss
Director - Etch Creative



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