



ANTI-BRIBERY POLICY



More information |

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Introduction

Bribery is defined as giving, offering, or receiving something of value that is given or offered in order to encourage the receiver to act improperly or to reward them for having done so.

It is a criminal offence for an individual, or a company, to make, receive, promise, request, or agree to receive, a bribe. In addition, Sword could be liable to prosecution for failing to prevent bribery if one of its employees or agents acts in this way and Sword has not put in place reasonable and adequate procedures to prevent it.

Penalties for bribery include very substantial fines and/or possible imprisonment.

This policy sets out our stance on bribery, our procedures and provides additional information.

Scope and Communication

This policy applies to all employees of Sword who should read and understand its contents.

The policy also covers all third parties who are involved in delivering or developing business on behalf of Sword or its subsidiaries anywhere in the world. This policy should be brought to their attention and referenced in the respective contract terms. This policy sets out Sword' stance on bribery, its procedures and provides additional information.

Bribery

Bribery in any form is not tolerated by Sword. Employees should be aware that it would constitute gross misconduct, leading to a potential dismissal. There may also be a duty to report such activity to the authorities.

Facilitation Payments

Facilitation payments are payments made directly to officials in order to induce those officials to perform routine functions they are otherwise obliged to perform. Although such payments may be routine practice in some countries, these constitute bribes.

Facilitation payments are prohibited by Sword.

Legally required administrative fees or fees for fast-track services are not facilitation payments and are permitted.

Charitable Donations

Charitable donations may be made by Sword as part of the Company's corporate social responsibility policy. Such donations must be approved by the Chief Executive, usually as part of a programme for the full year.

Political or charitable donations that are directly linked to obtaining new business or gaining a business advantage are prohibited.

Client Entertainment and Corporate Hospitality

Client entertainment and corporate hospitality may be offered by Sword staff, provided that:

- The Sword employee or representative offering the hospitality or entertainment is present at the event;
- The costs and scale of the event are within the guidelines set out in the Company's expenses policy (in the case of drinks or meals) or are agreed in advance with senior management;
- The hospitality or entertainment is not in conflict with any guidelines provided to Sword by the recipient's organisation;
- The hospitality or entertainment is not offered with a view to inducing the recipient to act improperly or to reward the recipient for having done so.

Gifts to the representatives and employees of clients and prospects are not permitted.

Receipt of Gifts and Corporate Responsibility

Sword staff may attend entertainment and corporate hospitality provided by suppliers, provided that:

- The supplier employee or representative offering the hospitality or entertainment is present at the event;
- The employee's line manager has given consent;
- The hospitality or entertainment is not offered with a view to inducing the recipient to act improperly or to reward the recipient for having done so.

Sword staff may not personally receive gifts from suppliers or potential suppliers. Any such gifts provided should either be returned or should be treated as the property of Sword.

If employees are in any doubt as to whether they may accept an invitation from a supplier, they should contact their line manager.

Sales Promotions

Sales promotions which involve a free gift should make clear that, where the client is a corporate entity, the gift is made to the client rather than to an individual employee of the client. Where clients have taken advantage of such an offer, reference to it and details of the gift must, as with any other product or service, be included on the tender/offer documents, notified to the finance department and included on the invoice sent to the client.

Resellers, Agents and Associates

All resellers, agents, and associates and any other third party acting on behalf of Sword or its subsidiaries are required to sign up to this policy.

Notification and Safeguard

Sword's employees, agents, resellers, and associates are required to report immediately either to their line manager, or to the CFO, any offers, requests, suggestions, or threats in relation to bribery made to them in the course of carrying out their duties.

Line managers receiving any such reports are required to report them to the CFO.

Whistleblowing

Sword employees have a duty to bring to the attention of the Company any behavior or practice which runs contrary to this policy.