

CDS Crawford Cars Anti-Bribery & Anti-Corruption Policy.	Authorised By: ISO Quality Manager Caroline Sullivan	Reviewed: 02/01/2020 Review: 02/01/2022	Page (1) ISO 9001:2015 1.1
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1. POLICY STATEMENT

CDS Crawford Cars is committed to conducting business fairly, ethically and within the law. As part of the UK Government's commitment to eradicating bribery, the Bribery Act 2010 came into force on 1 July 2011. We run our business honestly and will not tolerate bribery or corruption in any of our dealings or relationships or from any of our colleagues. We therefore have systems in place to prevent bribery and corruption and require all our employees and associated persons to make decisions in line with it. CDS Crawford Cars does not tolerate any form of bribery and corruption.

2. WHO IS COVERED BY THIS POLICY

The purpose of this policy is to set out the responsibilities of every person which CDS Crawford Cars is associated with to observe and uphold our Zero Tolerance position to bribery and corruption. The term "associated persons" used in this Policy includes, but is not limited to any individual organisation that CDS Crawford Cars comes into contact with in the course of its business such as actual and potential clients, customers, suppliers, business contacts, agents, advisors government and public bodies, their advisers, representatives and officials, politicians and political parties.

This Policy applies to all CDS Crawford Cars business dealings and transactions in all countries in which we operate. There is no exception to this Policy. CDS Crawford Cars does not tolerate any form of bribery corruption. Violation of this Policy may be grounds for dismissal, termination, of contract prosecution or additional criminal or civil sanctions. If local laws, codes of conduct, or other regulations in a particular country or region are more restrictive on this subject, or require government approval of the transaction, then the more restrictive requirements must be complied with.

3. WHAT IS BRIBERY

Bribery is any activity that is a criminal offence under the Bribery Act 2010. There are four offences (the "Bribery Act Offences"):

1. Bribing another person (Section 1)
2. Being Bribed (Section 2)
3. Bribing a foreign public official (Section 6)
4. Failure of a commercial organisation to prevent bribery (Section 7)

Bribing another Person (Section 1)

Where a person (P) offers, promises or gives a financial or other advantage to another person ® and P intends the advantage to induce R to perform a relevant function or activity improperly, P commits an offence.

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A relevant function or activity means one that is:

1. Connected with Business
2. Performed in Employment or
3. Performed on behalf of another Body that should be performed in good faith, or impartially, and/or by a person in a position of trust.
- 4.

Being Bribed (Section 2)

Where a person requests, agrees to receive or accepts a financial or other advantage intending that a relevant function or activity is performed improperly he/she commits an offence.

Bribing a foreign public official (Section 6)

A person (P) who bribes a foreign public official commits an offence if it is P's intention to:

1. Influence him in his capacity as a foreign public official and
2. Obtain or retain business or an advantage in the conduct of business.

Failure of a commercial organisation to prevent Bribery (Section 7)

A relevant commercial organisation is guilty of an offence if a person associated with it bribes another person intending to obtain or retain business for the organisation, or an advantage in the conduct of the organisation's business.

4 GIFTS HOSPITALITY, ENTERTAINMENT AND EXPENCES

All those associated with CDS Crawford Cars must not engage in any activity that might lead to, or suggest, a conflict interest with the business of CDS Crawford Cars. The offering, or giving, of gifts, hospitality and entertainment must:

1. Not be given/received with the intention of influencing a third party to obtain or retain business or a business advantage, to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
2. Not constitute an offence under The Bribery Act.
3. Comply with Local Law.
4. Be given at Corporate Level not an individual level.
5. Not include Cash or a Cash Equivalent.
6. Be appropriate, reasonable,
7. Be appropriate, reasonable, and proportionate, given in good faith at an appropriate time.
8. Be given openly and not be offered to, or accepted from, government officials, representatives, politicians or political parties without the express prior approval of a member of the CDS Crawford Cars Chairman & CEO.

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5. FACILITATION PAYMENTS AND KICKBACKS

CDS Crawford Cars does not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure, or expedite, a routine administrative action by a UK or foreign government official. Kickbacks are another way of describing a bribe and typically consist of payments made in return for a business favour or advantage. You must not engage in any activity that might lead to, or suggest, that a facilitation payment or kickback will be made, or accepted, by CDS Crawford Cars.

CDS Crawford Cars recognises that in some countries facilitation payments are permitted in law. CDS Crawford Cars is subject to the provisions preventing facilitation payments in the UK regardless of whether local law permits facilitation payments. They are therefore completely prohibited by CDS Crawford Cars regardless of country.

6. DONATIONS

CDS Crawford Cars does not make contributions to political parties. We only make charitable donations that are Legal and ethical under local laws and practices. No donation of any kind must be offered, or made on behalf of CDS Crawford Cars without the express consent of the Chairman or CEO and Company Secretary.

7. YOUR RESPONSIBILITIES

You must ensure that you have read and understand the terms of this Policy. You must comply with its terms at all times when acting on behalf of CDS Crawford Cars. You must inform CDS Crawford Cars of the details of any third party or other engaged by you on behalf of CDS Crawford Cars and you must ensure that they agree to be bound by, and comply with, the terms of this policy.

If you employ staff who act as agents on behalf of CDS Crawford Cars or engage others to do so (where permitted) you must ensure that those persons are fully aware of the terms of this documentation and where necessary ensure training is provided. Under no circumstances may you offer gifts (cash or otherwise) to any of our colleagues. Any such offer shall be refused. Offers of corporate hospitality are subject to the provisions of paragraph 4 above and may only be accepted by colleagues if they have obtained the appropriate authority in advance. Colleagues must declare any offers received.

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8. RECORD KEEPING PROVISIONS

You must ensure that you retain documentation identifying and relating to any third party or other engaged by you on behalf of CDS Crawford Cars.

9. COMMUNICATION

This Policy will be communicated to our suppliers, contractors, agents and business partners who will be asked to review the Policy and agree by its terms.

10. RASING CONCERNS AND SEEKING GUIDANCE

Employees, suppliers or agents can make confidentially with CDS Crawford Cars by:

Emailing HR@Crafordsoflondon.co.uk

Anyone raising a concern in good faith will not be criticised or penalised in any way even if it is shown, after investigation, that they were mistaken. Any form of victimisation against anyone who has raised a genuinely held concern is forbidden and will not be tolerated and itself will be treated as a disciplinary matter

11. PENALTIES

Violations of the UK Bribery Act 2010 are a serious matter and could result in significant criminal and/or civil, penalties for CDS Crawford Cars and for those individuals responsible for an offence.

Penalties include imprisonment for individuals committing the offence for up to 10 years together with unlimited fines for individuals and the business.

Fines imposed on individuals will not be paid by CDS Crawford Cars. A violation will also result in Disciplinary Action by CDS Crawford Cars, up to, and including Termination of Employment or other contract.

Policy Owner	Created 2010	Review 2022
CDS Crawford Cars		