



## Anti-Bribery and Corruption Policy

This policy applies to all persons working for us (or on our behalf) in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. It sets out both our, and your, responsibilities in observing and upholding our position on bribery and corruption. It also provides information and guidance about how to recognise and deal with bribery and corruption.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

### Policy Statement

Bribery and corruption are criminal offences. A **bribe** (or **kickback**) is a financial or other inducement which is offered, requested, promised or provided or accepted for the purpose of gaining an improper commercial, contractual, regulatory or personal advantage. A bribe can include money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value. **Corruption** is the abuse of entrusted power or position for private gain.

#### Zero Tolerance

We have a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate. We will continue to ensure that we apply the highest standards of ethical conduct and integrity in all our business activities in the UK and overseas.

#### Transparency

We are also committed to implementing and enforcing effective systems throughout BMJ to ensure there is transparency in our own business and in our approach to tackling bribery and corruption throughout our supply chains.

#### Working with us

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes we include specific prohibitions against bribery and corruption. We expect our suppliers to hold their own suppliers to the same high standards.

### What you must do

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of bribery and corruption is the responsibility of all those working for us or under our control.

#### You must not:

- **give a bribe** by giving, promising or offering any payment, gift, hospitality or other benefit:
  - with the expectation or hope that an advantage will be received (or to reward an advantage already given); or
  - to a government or public official, agent or representative to facilitate or expedite a routine procedure or with the expectation or hope that an advantage will be received (or to reward an advantage already given);
- **accept a bribe** by accepting or requesting a payment, gift, hospitality or other benefit from a third party where you know, or suspect, that it is being offered with the expectation that it will provide an advantage for them (or anyone else) in return;

- **engage in threatening or intimidating behaviour** by threatening or retaliating against another worker who has refused to engage in bribery or corruption, or who has raised concerns under this policy; or
- **engage in any other activity** that might lead to a breach of your obligations under this policy.

## Reporting

You must notify your line manager and our Group Risk Manager as soon as possible if you believe or suspect that bribery or corruption is going on in any part of our business or supply chain. If you are unsure about whether or not a particular act may constitute a bribe or corruption, we encourage you to still raise it.

If for any reason you feel unable to speak to your line manager or our Group Risk Manager about your concerns then we would encourage you to still report the matter in accordance with our Whistleblowing Policy.

## Gifts and Hospitality

You can still give and accept reasonable and appropriate gifts and hospitality for legitimate purposes such as building and maintaining relationships, maintaining our image and reputation, or presenting our products and services effectively. You must ask yourself *is the gift, entertainment or hospitality is **reasonable and justifiable** in the circumstances?* For example:

- **Type / value:** A gift or hospitality which is unduly lavish or extravagant will not be appropriate.
- **Reason:** Why is the gift or hospitality being given? Timing can also be an important consideration - For instance, a gift or hospitality given during contractual negotiations or a tender process will not be appropriate as it could be seen as an inducement or reward for any preferential treatment.
- **Cash:** You must never accept a gift of cash or a cash equivalent (such as vouchers).
- **Transparency:** A gift or hospitality must never be secret.

If you are offered a gift or hospitality which does not meet our requirements you must immediately report it to your line manager and our Group Risk Manager.

**Reporting gifts over £49 GBP:** Any gift with a value over £49 GBP (or the local equivalent outside the UK) must be declared and approved by your line manager before it can be accepted or given. To make a declaration please complete our [Gift Register Submission Form](#).

## Keep records

When giving or receiving any gift or hospitality you must always keep an accurate and complete record of it including copies of any invoices and other relevant documents (such as any declarations you have made using our [Gift Register Submission Form](#)). Your records must never be kept “off-book” to facilitate or conceal payments or conduct which is improper.

## Our commitment to you

Individuals who refuse to accept or offer a bribe, who raise concerns, or report another’s wrongdoing, can sometimes be worried about the possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or reporting in good faith their suspicion that bribery or corruption is (or may be) taking place. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform our HR Director immediately.

## Communication and awareness of this policy

Training on this policy, and on the risk our business faces from bribery and corruption in its supply chains, forms part of the induction process for all individuals who work for us. Regular update training will be provided as necessary.

Our zero-tolerance approach to bribery and corruption must be communicated to all major suppliers, contractors and business partners at the outset of any business relationship with them and reinforced as appropriate thereafter.

## Consequences of breaching this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

## Responsibility for this policy

Each person working for us or on our behalf (in any capacity) is responsible for ensuring that they comply with their obligations in this policy. However, the following are responsible for overseeing compliance with this policy generally and on a day-to-day basis:

### Our Executive Team

Has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

### Our Group Risk Manager

Has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery and corruption.

### Our management - at all levels

Are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of bribery and corruption in supply chains.

## Contact us

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Group Risk Manager.

*This policy was last updated on 12 August 2021*