



Allsorts Childcare Anti-Bribery Policy

Purpose

Allsorts values its reputation for ethical behaviour and for financial probity and reliability. It recognises that any involvement in bribery will also reflect adversely on its image and reputation.

Its aim therefore is to limit its exposure to bribery by:

- setting out a clear anti-bribery policy,
- establishing and implementing anti-bribery procedures as appropriate,
- communicating this policy and any relevant procedures to employees and to others who will perform services for the Company,
- undertaking appropriate due diligence measures before engaging others to represent Allsorts in its business dealings,
- monitoring and reviewing the risks and the effectiveness of any anti-bribery procedures that are in place.

Procedure

Allsorts prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement):

- to or from any person or company,
- by any individual employee, agent or other person or body acting on behalf of Allsorts,
- in order to gain any commercial, contractual or regulatory advantage for Allsorts in a way that is unethical,
- or in order to gain any personal advantage for the individual or anyone connected with the individual.

This policy prohibits any bribe that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of Allsorts or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in any doubt as to whether a potential act constitutes bribery, the matter should be referred to the Finance Director before proceeding.

Employee's Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees, and Allsorts is committed to:

- encouraging employees to be vigilant and to report any suspicion of bribery,
- providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately,
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution,
- taking disciplinary action against any individual(s) involved in bribery.

Any suspicion of bribery should be reported in confidence to the Finance Director who has overall responsibility for bribery prevention.