



# Anti-Bribery Policy

## Policy

### A. Use of Business Partners

It is the policy of Gulliver's Truck Hire Ltd to conduct all of its business in an honest and ethical manner. Gulliver's Truck Hire Ltd takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

### B. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include, without limitation, the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

*How to evaluate what is 'acceptable':*

First you must consider the following:

- ▶ What is the intent – is it to build a relationship or is it something else?
- ▶ How would this look if these details were on the front of a newspaper?
- ▶ What if the situation were to be reversed – would there be a double standard?

Difficulty in answering one of the above questions may suggest a risk involved which could potentially damage the reputation and business of Gulliver's Truck Hire Ltd. The action could well be unlawful. Although no two situations are the same, the following guidance is considered:

*Never acceptable*

Circumstances which are never permissible include examples that involve:

- ▶ A "quid pro quo" (offered for something in return)
- ▶ Gifts in the form of cash/or cash equivalent vouchers
- ▶ Entertainment of a sexual or similarly inappropriate nature

*Usually acceptable*

Possible circumstances that are usually acceptable include:

- ▶ Modest/occasional meals with someone with whom we do business

- ▶ Occasional attendance at ordinary sports and other events
- ▶ Gifts of nominal value, such as pens, or small promotional items

*Transparency is Key*

Any form of gift, entertainment or hospitality given, received or offered will be appropriately recorded in a register held by the Finance Director.

**C. Facilitation Payments**


The UK Bribery Act 2010 makes no distinction between facilitation payments and bribes. Not with standing that in many countries it is customary business practice to make payments or gifts of small value to officials of large organisations in order to speed up or facilitate a routine action or process, such facilitation payments are against Anti-Bribery Policy. The Directors take the view that they are illegal within the UK as well as within any country in which Gulliver’s Truck Hire Ltd, or its business partners, operate.

**D. Accurate Books and Record-Keeping**

The Financial Director ensures that accurate books, records and financial reporting are kept and for significant business partners working on behalf of Gulliver’s Truck Hire Ltd, records and overall financial reporting must also be transparent. That is, they must accurately reflect each of the underlying transactions.

**E. Policy Review**

It is the ultimate responsibility of the Directors of Gulliver’s Truck Hire Ltd to routinely review and reinforce the Gulliver’s Truck Hire Ltd Anti-Bribery Policy and its underlying principles and guidelines and to ensure it is implemented throughout the Company, its employees, its agent, contractors, distributors and other business partners.

Director ..... 

Date ..... *Nov 2016*