



# ANTI-BRIBERY AND ANTI -CORRUPTION POLICY



## Anti-Bribery and Anti-Corruption Policy

### 1. Policy Statement and Scope

Quiss Technology is committed to upholding the highest standards of professional integrity, in all its business dealings and relationships. Our reputation with our clients, suppliers and other partners is underpinned by our core values:

- Integrity – honestly, transparency and ethical behaviour
- Respect – a ‘People-First’ culture
- Collaboration – teamwork, continuity, and long-term partnerships
- Innovation – technology with purpose, not gimmicks
- Customer Focus – value at every touch point

Our vision is to be the trusted Managed Service partner for our clients. Allegations of bribery or corrupt practices can harm customer trust and damage our reputation significantly. It is also a criminal offence. Such acts are punishable by up to 10 years of imprisonment for individuals and if the Company is discovered to have taken part in corruption, it will face an unlimited fine.

We therefore take our legal responsibilities very seriously and as such, Quiss prohibits all forms of bribery and corruption.

Quiss is bound by and is compliant with all laws related to anti-bribery and corruption including the Bribery Act 2010 in relation to our conduct within the UK and abroad. We are committed to implementing and enforcing systems that ensure bribery and corruption are prevented, aligning with our zero-tolerance approach.

This policy exists to:

- a) set out the expectations of the Company and those working for it, in observing and upholding its zero-tolerance position on bribery and corruption
- b) act as a source of information and guidance for all individuals working for Quiss, on how to recognise and deal with bribery and corruption issues
- c) act as a clear statement to all our business partners and clients

This policy applies to all employees of Quiss (regardless of seniority, location, and status i.e. permanent, fixed term or temporary).

This policy also extends to individuals working on our behalf, for example, agency staff or contractors or other individuals representing Quiss.

All employees and associated individuals are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity.

Failure to comply with this policy may result in action being taken against the employee, under the Disciplinary policy, including dismissal (termination of contract), if deemed gross misconduct. For contractors or third parties, it may lead to the termination of their contract with



Quiss. It may also become a criminal matter.

## 2. What is Bribery?

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage, so to induce or influence an action or decision.

Bribes can take many forms: from money, gifts, loans, fees, hospitality, services, vouchers, discounts, to the awarding of a contract or any other advantage or benefit. This behaviour is dishonest, illegal and a breach of trust.

Accordingly, employees and associated individuals are prohibited to engage in any form of bribery or corruption, whether it be directly, passively or through a third party. If they are uncertain about whether something is a bribe or a gift or an act of hospitality, they must seek further advice from HR or the Finance team.

## 3. Entertainment, Hospitality and Gifts

Entertainment and hospitality such as a meal, invitations to events, functions, or other social gatherings, in connection with matters related to our business or as a simple token of appreciation and gratitude, are acceptable, provided that:

- a) they fall within reasonable bounds of value and are limited, in occurrence
- b) the intention behind the meal / invitation is considered

it must not be open to the perception that it is an attempt to influence an employee or expose the Company to criticism that the provider of the hospitality was exerting undue influence.

On occasion, packaged gifts or vouchers may be received by Quiss employees or associated individuals. Gifts may only be accepted where they are low cost, functional items suitable for business use e.g. diaries, calendars, pens.

Gifts which have a higher value must be declared and handed in to the Finance team, who will record the items for audit purposes on the 'Gifts and Hospitality' register. These items will be subject to scrutiny and review by the Directors.

## 4. Unacceptable behaviour or conduct

It is not acceptable for any employee or associated individuals to:

- a) give, promise to give, or offer, a payment, gift or hospitality, with the expectation or hope that either a personal or business advantage will be received; or to reward either a personal or business advantage
- b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a decision or process
- c) accept payment from a third party that the employee/associated individual knows or suspects, is offered with the expectation that it will render either a personal or business advantage for them



- d) accept a gift or hospitality from a third party if an employee/associated individual knows or suspects that it is offered or provided with an expectation that either a personal or business advantage will be provided by Quiss in return
- e) accept a gift or hospitality from a third party who is tendering for a contract to be awarded by Quiss either on its own or jointly with other parties
- f) turn a blind eye to any of the above
- g) threaten or retaliate against another employee or associated individual who has refused to commit a bribery offence or who has raised concerns under this policy
- h) engage in any activity that might lead to a breach of this policy

## 5. Donations

Quiss, nor Quiss associated persons can use Quiss funds or facilities to provide support for, nor contribute to, any political organisation or political candidate. Quiss is politically neutral and does not make any contributions to political parties.

## 6. Individual Responsibility

Employees and associated individuals must ensure that they have read and understood all the information contained within this policy and similarly with any training or other anti-bribery and anti-corruption information, they are given.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of everyone working for (or representing) Quiss. All employees and associated individuals are prohibited from engaging in any activity that might lead to, or suggest, a breach of this policy.

Employees or associated individuals should use the Quiss Whistleblowing policy or notify HR, as soon as possible, if they believe or suspect that a conflict with this policy has occurred or may occur in the future. If they are unsure whether a particular act constitutes bribery or corruption, they should contact HR or the Finance team.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. It may also lead to a criminal investigation.

Quiss reserves the right to terminate its contractual relationship with associated individuals or third parties, if it is found to have breached this policy.

## 7. Raising a concern

If an employee or associated individual suspects that there is an instance of bribery or that corrupt activities may be occurring, they are encouraged to raise their concerns at as early a stage as possible, either through the Whistleblowing Policy or by discussing their concerns with HR.

Quiss will familiarise all employees with its whistleblowing procedures so employees can voice their concerns swiftly and confidentially.



If employees or associated individuals are uncertain about whether something is either a bribe, a gift, or an act of hospitality, they must seek further advice from the Finance Team or HR.

## 8. Protection

If an individual has refused to accept or offer a bribe, or they have reported a concern relating to potential act(s) of bribery or corruption, Quiss understands that the individual may feel worried about potential repercussions and will support anyone who raises concerns in good faith under this policy, even if an investigation finds that they were mistaken.

Quiss will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe, refusing to engage in other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

If an individual has reason to believe they have been subjected to unjust treatment as a result of raising a concern or refusing to accept a bribe, they should inform their manager or HR.

## 9. Awareness and Training

This policy is available to all staff through Q-Hub and will also form part of the new starter induction process.

Employees will confirm they have read and understood this policy. Quiss will also provide online training.

Our zero-tolerance approach to bribery and corruption will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations and our policy will be available on our website.

## 10. Record Keeping

The Head of Finance will keep detailed and accurate financial records and will have appropriate internal controls in place as evidence for all payments made.

The Finance team will also update the 'Gifts and Hospitality' register for audit purposes, documenting the gifts given which are subject to Directorial review.

## 11. Monitoring and Reviewing

The Director of Operations has the overall responsibility for monitoring the effectiveness of this policy and will ensure it is reviewed every two years, so that it remains compliant with legislation and HR best practice aimed at combating bribery and corruption.

This policy does not form part of an employee's contract of employment and may be reviewed and amended at any time. However, as with all policies and procedures, employees are expected to adhere to the expectations, behaviours and standard code of conduct outlined in this document.

