



# Anti-Bribery Policy

## **Introduction**

Bribery is a criminal offence. Impulse Automation prohibits any form of bribery. We require compliance from everyone connected with our business with the highest ethical standards and applicable anti-bribery laws. Integrity and transparency are of utmost importance to us. We have a zero-tolerance towards corrupt activities of any kind, whether committed by employees or third parties acting for or on behalf of the company.

## **Policy**

It is prohibited, directly or indirectly, for any employee or person/s working on our behalf to offer, give, request or accept any bribe, i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company to gain commercial, contractual or regulatory advantage for the company, or to gain any personal advantage for an individual or anyone connected with the individual in an unethical way.

## **Reporting**

Any employee or person/s working on our behalf suspects any activity related to bribery or attempted bribery; even if that person/s is not personally involved, the event should be reported to senior staff members.

## **Gifts and Hospitality**

Impulse Automation realises that the giving and receiving of gifts and hospitality are reflections of friendship or appreciation where nothing is expected in return, which may occur or even be commonplace in our industry. It does not constitute bribery where it is proportionate and recorded properly.

Gifts should not be given, nor should hospitality be offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from senior staff members.

Similarly, no gift or offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from senior staff members.

## **Record Keeping**

A record will be made by senior staff members of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review, and the company reserves the right to amend it without prior notice.