



**AGILITÉ**  
A PARELLA COMPANY

# Anti-bribery and corruption policy.

**Keeping our business honest, transparent and free from  
corruption.**

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## **Introduction.**

This anti-bribery policy sets out the responsibilities of Agilité and those who work for us in observing and upholding our zero-tolerance position on bribery and corruption. It also acts as a source of information and guidance for those working for Agilité, helping them to recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

# Policy statement.

Agilité is committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that prevent bribery. Agilité has zero-tolerance for bribery and corrupt activities. We act professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

Agilité will uphold all laws relating to anti-bribery and corruption in all jurisdictions in which we operate – recognising that bribery and corruption are punishable by imprisonment and fines. If our company is found to have taken part in corrupt activities, we may face an unlimited fine, be excluded from tendering for contracts, and suffer serious reputational damage. With this in mind, we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

## Who is covered by the policy?

This anti-bribery policy applies to all employees (temporary, fixed term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us (including third parties), or any of our subsidiaries – no matter where they are located. The policy also applies to officers, trustees, board, and committee members at any level.

In the context of this policy, “third-party” refers to any individual or organisation our company works with. This includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government or public bodies – as well as their advisors, representatives, officials, politicians, and political parties.

Any arrangements our company makes with a third party must include clear contractual terms, including specific provisions requiring the third party to comply with minimum standards and procedures on anti-bribery and corruption.

# Definition of bribery.

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or advantage to influence an action or decision. A bribe is any inducement, reward, or item of value offered to another person to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe – if an individual accepts a bribe, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether directly, indirectly (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world and they must not accept bribes in any form. If you are uncertain about whether something is a bribe, gift, or act of hospitality, seek advice from your line manager or country head.

# What is and isn't acceptable.

This section covers four areas: gifts and hospitality, facilitation payments, political contributions and charitable donations.

## 1. Gifts and hospitality

- / They are not made to influence the recipient, gain or reward business, or exchange favours for benefits
- / There is no suggestion that a return favour is expected
- / They comply with local law
- / They are given in the name of the company, not in an individual's name
- / They do not include cash or equivalents (e.g. a voucher or gift card)
- / They are appropriate for the circumstances (e.g. small seasonal gifts or as a thank you after a project)
- / They are of a suitable type and value for the occasion
- / They are given or received openly, not secretly
- / They are not targeted at a key decision-maker with the intention of influencing them
- / They are not above the maximum value set out by the HR manager (usually £/\$/€100).
- / They are not offered to or accepted from government officials, representatives, politicians, or political parties without prior approval from your line manager.

Where it would be culturally inappropriate to refuse a gift, it may be accepted but must be reported to the HR manager for review. Because gift-giving customs vary worldwide, employees should always disclose gifts given or received to their line manager or country head – particularly those from suppliers. If in doubt, seek advice.

## **2. Facilitation payments and kickbacks.**

Agilité does not allow any form of facilitation payment. These are unofficial payments to speed up routine duties or actions and typically made in exchange for a business favour or advantage.

If avoiding a facilitation payment or kickback could put you or your family's safety at risk, you must:

- / Keep the amount to the minimum possible
- / Request a receipt showing the amount and reason for the payment
- / Create a written record of the incident
- / Report it to Agilité's HR manager immediately.

## **3. Political contributions.**

Agilité does not make political donations in any form. This avoids any perception of seeing an improper business advantage.

## **4. Charitable contributions.**

Agilité does not make political donations in any form. This avoids any perception of seeing an improper business advantage.

# Employee responsibilities.

As an employee of Agilité, you must:

- / Read, understand, and comply with this policy as well as any related training and information
- / Prevent, detect and report any suspected bribery or corruption
- / Avoid activities that could lead to or suggest a breach of this policy
- / Report any suspicion of bribery or corruption to the HR manager.

Breaching this policy can result in disciplinary action, including dismissal for gross misconduct. Agilité has the right to terminate contracts with organisations and individuals who break this policy.

## Raising a concern.

If you suspect bribery or corruption is happening, raise your concerns with the HR manager or a board member as soon as possible. Agilité's whistleblowing policy outlines the full process and protocol – allowing colleagues to report concerns confidentially and without fear of retaliation. If you are offered or asked for a bribe, or you believe you are a victim of corrupt activity, you must inform the relevant country head immediately. Agilité will support anyone who raises a concern in good faith, even if it turns out to be a mistake. No one will suffer dismissal, disciplinary action, threats, or unfavourable treatment for refusing a bribe or reporting a concern.

If you believe you've been treated unfairly after raising a concern, report it to the HR manager immediately.

# Training and communication.

Agilité will provide training on this policy as part of the induction process for all new employees as well as regular refresher training for all colleagues.

We also make sure our zero-tolerance position on anti-bribery and corruption is communicated to and understood by suppliers, contractors, business partners, and other third parties at the outset of our working relationship.

Where there is a higher risk of encountering bribery, or we feel there is a need to reinforce how to comply with the Bribery Act, additional targeted training will be provided.

# Record keeping.

Agilité will keep detailed and accurate financial records and have controls in place to support all payments. We will record the amount and reason for all gifts or hospitality accepted and given – ensuring these are subject to managerial review.



## Monitoring and reviewing.

The HR manager is responsible for monitoring and reviewing this policy. They will regularly assess its effectiveness, suitability, and compliance with our anti-bribery commitments.

Internal controls will be audited regularly to ensure they work practice. The policy does not form part of an employee's contract of employment and may be updated at any time to improve its effectiveness. Colleagues are encouraged to offer their feedback and suggest improvements where relevant.

Signature:  Name: Neil Coales Date: 21/07/2025



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