

Anti-Bribery & Corruption Policy

Policy Owner: Jody Walker

Approved by: Managing Director

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Introduction

OSI conducts all its business activities with the utmost integrity and has a zero-tolerance approach to bribery and corrupt practices. This Anti-Bribery & Corruption Policy outlines our responsibilities, and the responsibilities of everyone working for or with OSI, in observing and upholding our position against bribery. It also provides guidance on how to recognize and handle any instances of bribery or corruption. The policy is informed by and compliant with the UK Bribery Act 2010, which is one of the strictest anti-corruption laws globally, and other relevant laws. Failure to comply with anti-bribery laws can result in severe criminal and civil penalties for OSI and individuals involved, as well as serious damage to our reputation. Therefore, we are committed to implementing and enforcing effective systems to prevent bribery and corruption in all parts of our operations. This policy applies to all OSI employees, directors, officers, agency workers, consultants, contractors, agents, and any other third-party representatives acting on our behalf (collectively referred to as “staff” in this policy).

Definition of Bribery and Scope

Bribery is defined as giving, offering, promising, requesting, or receiving (or agreeing to give/receive) a financial or other advantage with the intention of inducing or rewarding improper performance of a function or activity. In simpler terms, a bribe is an incentive or reward offered to someone to gain any commercial, contractual, regulatory, or personal advantage that is unethical or illegal. This can take many forms, such as cash payments, gifts, loans, fees, hospitality, services, or any valuable benefit. Corruption is the abuse of entrusted power for private gain and often involves bribery. This policy covers all forms of bribery and corruption, whether they take place directly or through third parties. It covers bribery of public officials and of private individuals or companies. Even in countries or contexts where bribery might appear “routine” (such as facilitation payments in some places), OSI’s policy is unequivocal: we do not pay bribes or facilitation payments and we do not permit others to do so on our behalf.

Our Commitments

No Offering or Accepting Bribes: OSI staff must never offer, give, solicit, or accept any bribe, whether cash or other inducement, to or from any person or company, whether a public official or private commercial entity, in order to gain an advantage in business. This includes seeking to improperly influence a tender outcome, secure a contract, expedite a government process, or any other business advantage.

Facilitation Payments Prohibited: So-called “facilitation payments” (small unofficial payments to secure or speed up routine actions, such as obtaining permits or releasing goods held in customs) are also considered bribes under UK law and are prohibited. OSI employees should avoid any such payments. If you are asked to make a facilitation payment, you should refuse and report the incident to management immediately.

Gifts and Hospitality: We understand that giving and receiving modest gifts and hospitality can be part of normal business courtesy and relationship-building. However, these can be abused and appear as bribes if not handled carefully. OSI has guidelines for acceptable gifts and hospitality. In general, staff may give or accept token gifts or reasonable hospitality (meals, invitations to events) only if it is of low value, infrequent, openly given, and not intended to influence any decision. Lavish or frequent gifts/hospitality are not allowed. Any gift or hospitality that exceeds a nominal value (set by internal guidance, e.g. £50) or which could be construed as a bribe must be declined or, if received unexpectedly, reported to a Director. All gifts and hospitality given or received above the nominal threshold must be recorded in OSI’s Gifts & Hospitality Register, which is periodically reviewed by management.

Donations and Sponsorships: OSI occasionally may support local charities or events (as part of our community engagement). Any charitable donations or sponsorships must be transparent, properly documented, and made only for legitimate charitable purposes. We never make donations with an expectation of favored treatment or to influence a business decision. OSI does not make political donations.

Third-Party Compliance: We expect all third parties acting on our behalf (such as agents, intermediaries, consultants, or contractors) to uphold the same anti-bribery standards. We are careful in the selection of such partners and communicate our policies to them. Appropriate due diligence is conducted, especially when entering new markets or high-risk arrangements, to ensure third parties have no history of corrupt practices. Our contracts with major suppliers and partners include clauses requiring compliance with anti-bribery laws and the right to terminate agreements for any involvement in bribery.

Responsibilities and Training

Employees and Associated Persons: Every OSI employee and person under OSI’s control is responsible for reading, understanding, and complying with this policy. Bribery is a criminal offense, and if you are caught engaging in it, you may be personally liable to prosecution, leading to fines or imprisonment, and you will face disciplinary action by the company (including dismissal). We require everyone to remain vigilant and report any suspicions or incidents of bribery. If you are ever unsure whether a particular act or gift constitutes bribery or is ethically acceptable, you should seek guidance from your manager or a company director before proceeding. OSI will provide training to employees on anti-bribery and corruption as appropriate to their role. For example, staff involved in procurement, contracting, or sales (who may be more exposed to bribery risks) will receive periodic training or briefing on how to recognize and deal with improper approaches, how to keep records that evidence compliance, and refreshers on legal obligations. New employees are briefed on this policy during induction.

Management: OSI's management (Directors and team leaders) are responsible for fostering a culture in which bribery is never acceptable. They must ensure the policy is implemented effectively, by overseeing training, monitoring compliance, and leading by example. Management will also assess risks of bribery in our business (for instance, reviewing if any upcoming tender or partnership involves high-risk factors) and take steps to mitigate those risks. This could include adding extra controls or approvals for transactions, or more closely supervising intermediaries. The Managing Director or a designated Compliance Officer holds primary responsibility for this policy's enforcement and will review the adequacy of anti-bribery procedures regularly.

Reporting and Whistleblowing

Any employee who suspects or knows of any instance of bribery or corruption must report it as soon as possible. You can report your concerns to your line manager or directly to a company Director. If you are not comfortable with these channels (for example, if you suspect a manager or director may be involved in the wrongdoing), you should use the process outlined in our Whistleblowing Policy to raise the issue confidentially. OSI will investigate all reported incidents of possible bribery with discretion and diligence. We will maintain confidentiality to the extent possible and ensure that anyone who comes forward in good faith is protected from retaliation. Retaliation against an employee for reporting a concern about bribery is a serious disciplinary matter. Remember that early reporting can protect OSI and its employees from legal and reputational harm – so we urge you not to hesitate if you have concerns.

Record-Keeping

OSI will maintain accurate books and records that properly document all financial transactions. False, misleading, or incomplete records can facilitate bribes and will not be tolerated. All expenses, receipts, invoices, and third-party payments must be recorded with sufficient detail and supporting documentation. In particular, records of gifts, hospitality, and payments to third parties must be maintained as noted. We conduct periodic audits of our financial controls and record-keeping practices to provide assurance that our accounts are not being used to conceal bribery. Strict financial controls are in place – for example, all payments must be approved according to authorization limits, and any unusual payment requests (such as payments to offshore accounts or to a person not party to a contract) are subject to scrutiny and higher approval.

Enforcement and Disciplinary Action

Bribery and corruption are taken very seriously by OSI. Any employee who breaches this policy will face disciplinary action, which could result in summary dismissal for gross misconduct. For external parties, any breach could lead to termination of contracts and possible legal action. OSI will cooperate with law enforcement authorities if required, including reporting incidents to the police or Serious Fraud Office. We are prepared to terminate business relationships with any third party who does not support our anti-bribery standards, or who puts us at risk of legal breach.

Monitoring and Review

The Board of Directors (or designated Anti-Corruption Compliance Officer) will monitor the effectiveness of our anti-bribery measures. This includes reviewing this policy at least annually and after any incident or change in relevant legislation. We will consider whether our risk assessments remain current, whether further training or communication is needed, and if any improvements to procedures are warranted. Any updates to the policy will be communicated to all employees and relevant stakeholders. By rigorously enforcing this Anti-Bribery & Corruption Policy, OSI aims to protect our integrity and reputation, assuring our public sector clients and partners that we operate to the highest ethical standards.

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