



Anti-Bribery & Corruption Policy

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1. Interpretation

BOARD	The board of GO LEAN Ltd
UK	Is referred to in this policy as the United Kingdom
GO LEAN	GO LEAN LTD – The organisation, company number 11718228

2. Company Statement

GO LEAN engages directly with individuals, groups and organisations within the UK and occasionally overseas. This policy is mandatory and has been endorsed for organisation-wide adoption by the Board and Directors of GO LEAN on the 03 April 2020.

3. The Bribery Act 2010

The UK is a signatory to the UN Convention Against Corruption, which requires participating countries to put in place anti-bribery criminal laws. Because of historic problems prosecuting corruption under previous legislation the Government recognised that broad-ranging and flexible powers were required and enacted the Bribery Act. The Bribery Act received Royal Assent in April 2010 and came to force on 1 July 2011.

The principal provisions of the Bribery Act include:

Two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery) (sections 1 and 2);

A discrete offence of bribing a foreign public official in order to obtain or retain business or an advantage in the conduct of business (section 6); • An offence which can be committed by commercial organisations which fail to prevent bribery committed on their behalf (section 7);

Raising the maximum sentence for bribery committed by an individual from 7 to 10 years imprisonment. The maximum sentence for an offence committed by a corporate body is an unlimited fine. Anti-bribery and Corruption Policy – Version 4.0 Page 4 of 7



4. The Seven Principles for Good Governance

The Government considers that procedures put in place by commercial organisations wishing to prevent bribery being committed on their behalf should be informed by six principles. GO LEAN LTD has widened the scope to seven principles. These are set out below. For detailed information on each principle, please follow the link below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832011/bribery-act-2010-guidance.pdf

Principle 1 - Proportionate Procedures

A commercial organisation's procedures to prevent bribery by persons associated with it are proportionate to the bribery risks it faces and to the nature, scale and complexity of the commercial organisation's activities. They are also clear, practical, accessible, effectively implemented and enforced.

Principle 2 - Top-level Commitment

The top-level management of a commercial organisation (be it a board of directors, the owners or any other equivalent body or person) are committed to preventing bribery by persons associated with it. They foster a culture within the organisation in which bribery is never acceptable.

Principle 3 - Adoption

The employees, associates, suppliers, partners and collaborators are committed to preventing bribery by persons associated with it. They actively participate in and promote the culture within the organisation in which bribery is never acceptable.

Principle 4 - Risk Assessment

GO LEAN assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.

Principle 5 - Due Diligence

The commercial organisation applies due diligence procedures, taking a proportionate and risk-based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified bribery risks.

Principle 6 - Communication & Training

The commercial organisation seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training, that is proportionate to the risks it faces.

Principle 7 - Monitoring & Review

The commercial organisation monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.



5. Scope and Procedure for Application

GO LEAN recognises that its national roles, its regulatory obligations, investment decisions and procurement and disposal activities involving high value assets, make it vulnerable to the risk of bribery and corruption. GO LEAN is therefore committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of funds and the management of its activities. GO LEAN adopts zero tolerance to bribery and corruption. The conduct of the GO LEAN Board, Executive Directors, staff and others directly involved in delivering GO LEAN business activities (including retained consultants acting on our behalf) form an essential part of these governance arrangements and ethical standards. General rules relating to conduct and disciplinary action are contained within employment terms and conditions; and specific policies and procedures in place relating to the prevention of bribery and corruption are summarised within this policy. The principles contained within this policy apply to both internal and external audiences, including anyone wishing to undertake business or engage with GO LEAN.



6. Active bribery

As a limited company, GO LEAN will not tolerate any internal action which encourages, implies, bestows, tolerates or promises an unfair, unlawful, improper or unethical advantage to any individual, group or organisation, regardless of whether there is financial inducement or not. Key measures designed to eliminate or reduce the likelihood of active bribery include existing financial controls and constraints, transparent reporting and publishing of all expenditure over £500, centralised advertising and publication of all contracts exceeding £10,000, internal and external auditing procedures, where applicable and the keeping of financial accounts.

7. Passive bribery

GO LEAN will not tolerate the acceptance of bribes to induce a favourable investment or regulatory decision, business transaction or other business outcome. At all times GO LEAN expects its Board Members, Executive Directors, staff and consultants acting on our behalf and suppliers, partners and collaborators to conduct their work ethically and to fully comply with their terms and conditions of employment and GO LEAN policies and procedures. Additional controls include: segregation of decision making, the policy, rules and recording procedures relating to the acceptance of corporate hospitality and gifts; the mandatory declaration of Board Members, Directors and staff conflicts of interest; the publication, updating and circulation of these policies internally and externally; periodic risk assessment, compliance monitoring and review; and the enforcement of disciplinary and authority reporting procedures where appropriate. The following policy extracts should be specifically noted:

6. Declaration of conflicts of interest policy

A 'conflict of interest' is considered to be any connection or association with a third party that is (or appears to be) against the best interests of GO LEAN, or which could enable you reasonably to be suspected of using your position within GO LEAN to gain an unfair advantage for or from a third party. Conflicts of interest are best avoided altogether; however, GO LEAN acknowledges that conflicts of interest (and potential conflicts) are sometimes unavoidable. In such circumstances the principles of openness and integrity apply, and you are required to disclose and manage these conflicts accordingly.

7. Gifts Policy

GO LEAN maintains specific gift acceptance policies and reporting procedures for regulation and non-regulation staff. The general rule is that employees and consultants are only permitted to accept and keep gifts of low value in accordance with the respective policies. Accepting and keeping all other gifts is not permitted. In the rare circumstances where a gift cannot be returned or declined, donation records must be maintained.

8. Hospitality Policy

Employees and consultants should decline all corporate hospitality offered by third parties unless this is within the Gifts and Hospitality Policy or if there are compelling business reasons to accept. Acceptance of hospitality outside the Gifts Policy will always require prior approval from an appropriate member of the Senior Team, Head of Function or the Director,



Finance and Corporate Services. Permission to attend sporting events, shows, concerts or similar entertainment paid for by third parties will not normally be granted.

9. Bribing Officials

GO LEAN primarily engages with UK officials; however, there may be rare occasions when we meet representatives from foreign governments accompanying inward investors or organisations for on-site fact finding trips. GO LEAN will not tolerate bribery or any other corrupt practice to produce a favourable outcome. In line with GO LEAN financial controls, including the Expenses Policy, reasonableness and value for money should be sought at all times. The bestowal of over-generous hospitality to an official is therefore inappropriate; and only receipted proven meal expenses will be reimbursed. Token memorial souvenir gifts in keeping with the nature of the visit and the culture of the place visited, may occasionally be offered or exchanged between organisations and their officials. Examples include a group framed photograph commemorating the event, a culturally appropriate souvenir or a book or digital medium recording the history of the area or project or a GO LEAN company publication.

10. Reporting actual or potential bribery concerns

GO LEAN maintains two important policies in connection with the reporting of actual or potential bribery concerns: the Whistleblowing Policy and the Anti-fraud Policy and Response Plan. It is important that all staff can report their concerns promptly and without fear of reprisal or victimisation and are aware of how to do so. GO LEAN's Whistleblowing Policy underlines our commitment and support for those that come forward to express their concerns. It is understandable that a whistle blower may be worried about coming forward for fear about possible repercussions. GO LEAN's Whistleblowing Policy explains how the Agency will help to accommodate any needs that may arise in relation to a whistleblowing disclosure as far as possible. The following extract is summarised from the Anti-fraud Policy and Response Plan and should be applied for the reporting of any bribery concern. In the first instance, any suspicion of bribery, corruption, fraud, theft or other irregularity should be reported, as a matter of urgency, to your line manager. If such action would be inappropriate, your concerns should be reported upwards to one of the following persons:

- Head of Function or Head of Team
- Any Executive Director
- Executive Director of Finance
- Chief Executive
- Additionally, all concerns must be reported to the Company Secretary

Individuals, groups or organisations with evidence or firm suspicion of GO LEAN involvement in active or passive bribery should contact antibribery@new-intelligence.

It is important to stress that in addition to prompt reporting, any document, correspondence, e-mail, text or voice message which may be relevant to the concern should be retained and the content discussed with the Legal Representatives and Company Secretary.



11. Reporting outcomes

GO LEAN will not hesitate to report or escalate to an appropriate higher authority actual or potential bribery issues. Where bribery is suspected, this is a potential criminal offence and will be reported to the police. Allegations of bribery will be thoroughly investigated and may result in appropriate disciplinary or police reporting action where substantiated.