



net zero sustainability

advisory • assurance • training

Bribery Act Policy

Authorisation

Name	Role	Date
Tahsin Choudhury	Director of Sustainability	14 th September 2021

Change History

Release	Date	Author	Description
Version 0.1	November 2020	Tahsin Choudhury	Document Template
Version 1.0	23 rd December 2020	Tahsin Choudhury	Bribery Policy created
Version 2.0	14 th September 2021	Tahsin Choudhury	Logo updated

Distribution

To	Through
All customers	Website and Email (if requested)

Bribery Act Policy

Definition:

The [UK Bribery Act](#) which was passed in 2010, introduces an offence of corporate failure to prevent bribery. The defence for a company against this liability is to prove that the company had adequate procedures in place to prevent bribery.

Bribery is defined, within the Bribery Act 2010, as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so

Policy Statement:

Net Zero Sustainability Limited is a company that provides Advisory, Assurance and Training Services in the area of Climate Change and Sustainability.

Net Zero Sustainability Limited has a zero tolerance to bribery in any form, including;

- Financial incentives
- Provision or acceptance of gifts
- Facilitation payments to
 - officials in public office or
 - positions of influence within a corporate structure.

This policy applies to all employees of Net Zero Sustainability Limited. For the purposes of this policy, the term “employee” means all employees of Net Zero Sustainability Limited staff including permanent, fixed term, and temporary staff, associates, students, secondees, any third party representatives, agency workers, volunteers, interns, agents and sponsors engaged with Net Zero Sustainability Limited in the UK or overseas. This policy also applies to all members of staff employed by any of Net Zero Sustainability Limited subsidiary companies.

All contractors and agents acting for or on behalf of Net Zero Sustainability Limited will be made aware of this policy, particularly during any procurement process. Reasonable due diligence must be carried out to ensure they are not acting in a way contrary to Net Zero Sustainability Limited policy or procedure.

Third parties acting for Net Zero Sustainability Limited are expected to take appropriate action should it be suspected or discovered that fraudulent activity or bribery is evident.

Any company employee who is found to be in breach of this policy will be subject to disciplinary procedures. Employees are reminded that fraud and bribery are also criminal offences. The company also reserves the right to seek redress via civil proceedings against individuals whose fraudulent acts or omissions have resulted in financial loss to Net Zero Sustainability Limited. This is regardless of whether the individual was prosecuted.

This policy has been developed to comply with the provisions of the Bribery Act 2010 and in particular addresses the following:

Principle	Net Zero Sustainability Limited Response
Proportionate procedures	Use of guidance issued, e.g. by the Ministry of Justice.
Top level commitment	This policy is approved by the Directors
Risk Assessment	The Company will identify potentially high risk activities and implement appropriate measures to mitigate such risks.
Due Diligence	Due diligence will be undertaken. This due diligence will be appropriate to the circumstances and risk involved.
Communication and training	The policy will be disseminated throughout the company. Appropriate training for staff will be implemented.
Monitoring and review	Appropriate monitoring will be undertaken. The policy will be reviewed at regular intervals.

Risk Assessment:

Net Zero Sustainability Limited is a micro business with a single Director/Employee. Net Zero Sustainability Limited has a very simple business model based on;

- **Man Day rates.** When working with customers Net Zero Sustainability Limited has a table of day rates (£) for different services including, but not limited to;
 - **Training**
 - **Creating training courses**
 - **Project Management**
 - **Consultancy Services**
 - **Legislative compliance services**
 - **Expenses and subsistence rates**
- **Referral/Introductory fees.** All work passed through to 3rd party supplier and framework partners is based on a pre-contract percentage (%) rate. This rate is based on overall contract cost, should the customer contract directly with the supplier

Hospitality:

Net Zero Sustainability Limited will on occasion invite prospective customers and suppliers, especially when an overnight stay is involved in customer meetings, to a lunch or evening meal.

As a set policy this entertainment will not exceed £50 per person.

As policy any employee or representative of Net Zero Sustainability Limited is not allowed to accept or provide any gift without notification to the MD of Net Zero Sustainability Limited.

Due Diligence:

As part of Net Zero Sustainability Limited business model **ALL** 3rd party suppliers and contractors will go through a basic due diligence process, gathering information on, but not limited too;

- Financial records (Company House)
- Insurance certificates
- Reference calls/site visits of previous customers
- Supplier take on procedures
- Health & Safety processes
- Other policies including;
 - Bribery
 - Corporate Social Responsibility
 - Modern Slavery

Publication of Policy:

This policy, along with all other Net Zero Sustainability Limited policies is reviewed annually and available on our website (www.netzerosustainability.com)