



## Anti-Bribery and Corruption Policy

### Definition

Bribery is, in the conduct of a company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence. The association prohibits any form of bribery. We require compliance from everyone connected with our association, with the highest ethical standards and anti-bribery laws where applicable. Integrity and transparency are of utmost importance to us, and we have a zero-tolerance attitude towards corrupt activities of any kind, whether committed by euromic members employees or by third parties acting for or on behalf of euromic.

### Purpose

The purpose of this policy is to convey to all association members and interested parties of euromic the rules of the association in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that euromic members conduct their business in a fair, professional and legal manner.

### Offences

It is an offence to:

- offer a bribe
- accept a bribe
- bribe an official
- as a commercial organisation, to fail to prevent a bribe.

You should be aware that if you are found guilty by a court of committing bribery, you will immediately be excluded from the association.

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means - in the course of business - giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

This policy applies to all euromic members, regardless of seniority or location. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

We will encourage the application of this policy wherever our association involves the use of third parties e.g. suppliers, contractors.

### Policy

It is prohibited - directly or indirectly - 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 in order to gain commercial, contractual or a regulatory advantage, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.



It is also prohibited to act in the above manner to influence an individual in his/her capacity as a public official. You should not make a payment to a third party on behalf of a public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy.

If anyone working on behalf of the association suspects that an act of bribery, or attempted bribery, has taken place, even if not personally involved, they are expected to report this to the Executive Director or a board member (and may be asked to give a written account of events.)

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

The association will ensure that all transactions, including any sponsorship or donations given to charity, are made transparently and legitimately. euromic takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in the cessation of our arrangement with you if you are a member.

#### Gifts and Hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include flowers, vouchers, food, drink, and event tickets when used in a hosted business context.

Hospitality includes entertaining, meals, or event tickets when used in a hosted business context, given or received to initiate or develop relations. Hospitality will become a gift if the host is not present. No gift should be given, nor hospitality offered by anyone working on our behalf to any party in connection with the association without receiving prior approval from the President or Executive Director.

Similarly, no gift nor offer of hospitality should be accepted by anyone working on our behalf without receiving prior approval from the President.

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