

Anti-bribery policy

Effective from 1st July 2011

Introduction

The Bribery Act 2010 came into force on 1st July 2011. ASB Environmental Limited (as part of Augean plc (“the company”)) has ensured that adequate procedures are in place to prevent bribery in the course of conducting business.

The law includes four new offences relevant to companies, which can be summarised as follows:

1. Active bribery; offering, promising or giving a bribe to another person
2. Passive bribery; requesting, agreeing to receive or accepting a bribe
3. Bribery of a foreign public official
4. Failure of a commercial organisation to prevent bribery

The guidance provided by the Ministry of Justice (The Bribery Act 2010 – Guidance) sets out six principles which the Government considers a framework for the anti-bribery procedures a commercial organisation should put in place. These principles are listed below:

1. Proportionate procedures
2. Top-level commitment
3. Risk assessment
4. Due diligence
5. Communication (including training)
6. Monitoring and review

In preparing for the introduction of the Act each of these principles was reviewed and they were used to develop the policy set out below.

1. **Augean plc (ASB Environmental Limited) anti-bribery policy**

ASB Environmental Limited (as part of Augean plc) is committed to carry out its business in a fair, open and honest manner, never resorting to bribery as a means to gain any business advantage or return. The board of directors believe that the rejection of bribery is consistent with good business, in the same way that we are fully committed to high standards of health & safety and compliance.

By rejecting bribery the company will maintain its strong reputation for providing a high quality of service to our customers, retain the confidence of our suppliers and reassure our shareholders, partners and other stakeholders.

In no circumstances will the use of bribery on behalf of the company be tolerated. Any employee found to have committed one of the offences listed above will be subject to disciplinary action and may face dismissal, in line with company policy. Any employee who is found to have colluded in or concealed any bribery offence may also face disciplinary action.

The following actions by employees are considered to constitute Gross Misconduct:

- i) Receiving and/or giving of bribes to effect the placing of business with a customer, supplier of goods or services, or other third party.
- ii) Encouraging or directing any partner or agent of the company to bribe a third party with the intention of effecting the placing of business on behalf of the company.

In the event that Gross Misconduct is proven against any employee, following the established company disciplinary procedures, this will lead to dismissal.

2. Company procedures

The company already has in place several procedures and policies which provide a high level of control over the use of company funds and when taken together provide protection against bribery and other malpractice being undertaken on behalf of the company. These include:

- i) Procurement procedures
All purchases of goods and services must be preceded by a purchase order and approved by an authorised manager or director. Invoices must only be paid once they have also been approved.
New suppliers and/or agents must be documented and authorised before they are entered into the SAGE financial system. As part of the authorisation the form used must include evidence that a risk assessment check has taken place (see Appendix 1) and if appropriate the supplier/agent should be added to the company's "third party risk assessment register".
- ii) Credit control procedures
All requests for new customer accounts must be made by the sales teams and authorised by the finance team. New accounts and any changes to account limits must be documented, accompanied by Dunn & Bradstreet credit check reports and authorised before they are entered into the SAGE financial system. As part of the authorisation the form used must include evidence that a risk assessment check has taken place (see Appendix 2) and if appropriate the supplier/agent should be added to the company's "third party risk assessment register".
No payments from customers should be accepted by individual employees on behalf of the company; all receipts must be paid to a registered company within the Augean plc group.
- iii) Expenses policy and Petty Cash
All employee expenses and petty cash payments can only be reclaimed through an employee expenses form, accompanied by receipts and authorised by a named manager. Where expenses claims include purchases made on behalf of other employees or third parties the expenses claim form must clearly show the name of those individuals and/or companies.
- iv) Charitable donations

Where charitable donations are proposed they must be consistent with promoting the good reputation of the company. Donations must be authorised by a director, clearly recorded and paid through the established procurement route.

In addition the company has introduced the following policies for hospitality and gifts:

v) Hospitality policy

The company does not prohibit the giving and receiving of hospitality by employees to/from customers, suppliers, or agents. However if hospitality is given or received this must never be a means to gain any business advantage or return and must never be considered excessive or disproportionate.

Hospitality may be appropriate to celebrate a successful event or a significant transaction, or to build a stronger working relationship. Any hospitality given or received must only take place in the UK and should only extend over a maximum of 2 days (and may include up to 2 overnight stays depending on location).

All hospitality provided by the company must be authorised by a director before any event is arranged and any invitations are made to participants. Any expenses incurred by employees during an event should be claimed through the usual expenses route.

Any hospitality received by an employee or provided by the company must be reported to the Finance team at Head Office, including the following information:

- a) Nature of the event
- b) Purpose of hospitality
- c) Date(s) of the event
- d) Identity of the third party providing/receiving the hospitality
- e) Identity of employees hosting/receiving the hospitality

vi) Gifts policy

The company does not prohibit the giving and receiving of gifts by employees to/from customers, suppliers, or agents. However if gifts are given or received this must never be a means to gain any business advantage or return and must never be considered excessive or disproportionate.

Gifts, for example Christmas hampers or bouquets of flowers, should only be given when this is the most appropriate way to thank an individual or third party for work they have undertaken on behalf of the company. The giving of any gift must be authorised by a director.

If gifts are offered to employees by third parties these must only be accepted if they are considered proportionate to the work or service which has been undertaken and any gift received by an employee in the course of their work must be reported to the Finance team at Head Office, including the following information (this information must also be provided for gifts given by employees on behalf of the company):

- a) Nature of the gift
- b) Purpose of the gift
- c) Date received

- d) Identity of the third party providing/receiving the gift
- e) Identity of the employee giving/receiving the gift

3. Reporting bribery

The company is committed to the highest standards of openness and accountability. To ensure that employees can voice concerns if they believe they have discovered malpractice a whistleblowing policy has been introduced. Employees are encouraged to report bribery activity whenever they discover it in the knowledge that protections are in place should they need them. The policy has been published separately and is available in the Employee Handbook and on the company intranet.

4. Monitoring and review

The company's success in maintaining its approach to preventing bribery will be monitored on a regular basis, including:

- i) An annual update to the board on the risks faced by the company
- ii) The reporting of any bribery-related activity to the board in the Finance Director's report
- iii) A review of new risks associated with bribery by the directors as part of the monthly review of the company risk register
- iv) The immediate notification to the Finance Director of any allegations of bribery-related activity by any employee or third party.

Appendix 1 – Updated new supplier request form

AUGEAN PLC	
NEW SUPPLIER REQUEST FORM	
*AUGEAN SITE:	<input style="width: 100%;" type="text"/>
*REQUESTED BY:	<input style="width: 100%;" type="text"/>
*SUPPLIER NAME:	<input style="width: 100%;" type="text"/>
*SUPPLIER ADDRESS:	<input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/>
*TELEPHONE NO:	<input style="width: 100%;" type="text"/>
FAX NO:	<input style="width: 100%;" type="text"/>
*ACCOUNTS EMAIL:	<input style="width: 100%;" type="text"/>
COMMENTS/SPECIAL INSTRUCTION	<input style="width: 100%;" type="text"/>
<u>BANK DETAILS:</u>	
BANK NAME:	<input style="width: 100%;" type="text"/>
*BANK ACCOUNT NO:	<input style="width: 100%;" type="text"/>
*BANK SORT CODE:	<input style="width: 100%;" type="text"/>
BRANCH ADDRESS:	<input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/>

* MANDATORY

If you require any further information, please contact us on 01937 844980.
Augean Plc, 4 Rudgate Court, Walton, Wetherby, LS23 7BF

Augean to Complete	<input style="width: 100%;" type="text"/>
D&B report run	<input style="width: 100%;" type="text"/>
Bribery Act Check	<input style="width: 100%;" type="text"/>
Account Approved Date

Appendix 2 – Extract from updated new customer request form

FOR OFFICE USE ONLY			
Account Manager:		Credit Required:	
Issuing Site:	DATE	ACCOUNT NO	CREDIT LIMIT
APPLICATION FOR ACCOUNT			
CREDIT INSURANCE LIMIT			
INTERNAL CREDIT LIMIT			
ACCOUNT APPROVAL SENT TO CUSTOMER			
D&B REPORT RUN			
BRIBERY ACT CHECK COMPLETED			