



Anti-corruption and Bribery Policy

1. POLICY STATEMENT

1. Kindred LCR CIC (“the Company”) is committed to conducting all of its business with honesty, integrity and fairness.
2. The Company condemns corruption and bribery in any form and will not tolerate it in its own business or with whom the Company does business with. It is committed to actively implementing and enforcing systems to counter such acts.
3. It recognises that the Company’s reputation is built upon its values as an organisation, its values of its employees and Board members both as individuals and as a collective.
4. The Company obliges to uphold all laws relevant to countering corruption and bribery, including the Bribery Act 2010.
5. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned. This could constitute gross misconduct for which an offending employee or Board member could be dismissed without notice, and even risk facing time in prison. A breach would also cause serious damage to the reputation and standing of the Company.

2. POLICY OBJECTIVES

1. To set out the responsibilities of the Company and its individuals in observing and upholding its position on anti-corruption and bribery.
2. To provide information and guidance to employees and Board members on how to recognise and deal with corruption or bribery.

3. DEFINITIONS AND TYPES

1. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
2. Facilitation payments or “kickbacks” are typically small, unofficial payments made to secure or expediate a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.

4. SCOPE

1. The rights and obligations set out in this policy and procedure applies to all employees and Board members of the Company equally.

5. DUTIES AND RESPONSIBILITIES

1. The Board of Directors has the ultimate responsibility to provide, implement and review this policy.
2. All staff and Board members have a duty to comply with this policy.

6. PROCEDURES

Gifts and Hospitality

1. The Company does not prohibit normal and appropriate gifts and hospitality (given or received) to or from Third Parties unless otherwise specifically stated. However, any gift or hospitality must adhere to the following requirements:
 - not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
 - comply with local law in all relevant countries;

Anti-corruption and Bribery Policy

- be given in the name of the organisation, not in an individual's name;
 - not include cash or a cash equivalent;
 - be appropriate in the circumstances;
 - be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
 - be given openly, not secretly; and
 - in the case of gifts, they must not be offered to or accepted from any government official or representative, politician or political parties, without the prior approval from Kindred's Chair
2. The Company recognises that the practice of giving business gifts varies between countries and regions, and what may be normal and acceptable in one area may not be in another. The test to be applied is whether in all circumstances the gift is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered.
3. It is not acceptable for an employee or Board member, or anyone on their behalf to:
- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the Company will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
 - give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
 - accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
 - accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the Company in return;
 - threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - engage in any activity that might lead to a breach of this policy.

Facilitation Payments and 'Kickbacks'

1. The Company does not make and will not accept facilitation payments or "kickbacks" of any kind.
2. Employees and Board members should avoid any activity that might lead to, or suggest, that a facilitation payment or "kickback" will be made or accepted by the Company.

Anti-corruption and Bribery Policy

3. In the event, an individual is asked to make a payment on the Company's behalf, they should ask for a written note which details the reason for the payment where possible. If there are any suspicions, concerns or queries about the payment, this should be raised with Kindred's CEO/Senior Executive Leader

Charitable donations and sponsorship

1. The Company only makes charitable donations and provides sponsorship that are legal and ethical under UK laws and practices; and which are in accordance with the Company's internal policies and procedures.
2. The Company will not make any contributions to political parties.

Record keeping

1. The Company must keep financial records and have appropriate internal controls in place to evidence the business reason for gifts, hospitality and payments made or received.
2. If an employee or Board member is required to register a gift or hospitality under this policy, they must complete the Company's Gift and Hospitality Registration Form and send it to the team administrator. Any gift or hospitality must be registered within 28 days.

Training and communication

1. Training on this policy will be provided to all employees and Board members.
2. Our zero-tolerance approach to corruption and bribery should be communicated to all clients, suppliers, contractors and business partners.

This policy has been approved and authorised by:

Policy Name	Version	Developed by	Amended y/n	Review Date
Anti-corruption and Bribery Policy	1	NH/ JA	n/a	2/10/21