

## Anti-Bribery Policy

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## INTRODUCTION

Maple People Limited was established in 2015 and is the London design studio of Maple People Limited. We are a multi-disciplinary Business embracing design, construction, research, development and innovations. Our clients include private individuals, major property investors and developers and government agencies from around the world.

### 1.0 Policy Statement

Maple People Limited takes bribery and corruption very seriously; and will not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this policy. This Policy provides a coherent and consistent framework and applies to all employees and representatives of the company including temporary workers, consultants, contractor's agents and subsidiaries acting for, or on behalf of Maple People Limited within the UK and overseas. All employees and associated persons are required to familiarize themselves and comply with this policy, including any future updates that may be issued by the practice.

Every employee and associated person acting for or on behalf of Maple People Limited is expected to act professionally, honestly and with integrity at all times and to safeguard the organization's resources for which they are responsible. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the practice. Maple People Limited may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010.

### 2.0 Bribery Act 2010

The Bribery Act 2010, which came into force in July 2011 covers:

- The main areas of liability under the Bribery Act 2010;
- The responsibilities of employees and associated persons acting for, on behalf of, Maple People Limited; and
- The consequences of any breaches of this policy.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intentions of inducing or rewarding improper performance of a function or activity; or
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another company or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

An employee or associated person acting for, or on behalf of the practice, promises, gives, requests, receives or agrees to receive bribes; or

An employee or associated person acting for, or on behalf of the practice, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his / her duties (where local law does not permit or require such influence); and The Business does not have the defense that it has by adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy in accordance with the Bribery Act 2010.

### 3.0 What Is Prohibited

Maple People Limited prohibits employees or associated persons from offering; promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust.

In the UK or if applicable, abroad, it is unacceptable to:

- Give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a commercial or contractual advantage will be received, or to reward a business advantage already given
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to gain a regulatory advantage or "facilitate" or expedite a routine procedure.
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- To gain any personal advantage, financial or otherwise or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy
- Engage in activity in breach of this policy

This prohibition also applies to the indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or subcontractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers and other third parties.

The business does not make donations to any political parties. Employees and associated persons are not permitted to make any political donations on behalf of Maple People Limited.

### 4.0 Records

Employees, and where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contractors or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

In accordance with ISO requirements and Business risk management procedures, evaluations should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered.

## 5.0 Working Overseas

Employees and associated persons conducting business on behalf of Maple People Limited outside of the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based employees and should be extra vigilant when conducting international business.

Employees and associated persons are required to report the following to the Directors:

Close family, personal or business ties that a prospective agent, representative or joint venture partner may have with government or corporate officials, directors or employees.

- A history of corruption in the country in which the business is being undertaken.
- Requests for cash payments.
- Requests for unusual payment arrangements, for example via a third party.
- Requests for reimbursements of unsubstantiated or unusual expenses; OR
- A lack of standard invoices and proper financial practices.

If an employee or associated person is in any doubt as to whether or not a potential act constitutes bribery, the matter should be referred to the Directors.

## 6.0 Facilitation Payments

Maple People Limited prohibits its employees or associated persons from making or accepting facilitation payments as these are bribes and illegal. Facilitation payments are commonly small payments made to secure or speed up routine actions; usually by public officials, such as issuing permits or providing services. Facilitation payments are distinct from an official, publicly available fast-track process. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and the Practice, under the Bribery Act 2010, even where such payments are made or requested overseas. Employees and associated persons are required to act with greater vigilance when dealing with government procedures overseas.

Where a public official has requested a payment, employees or associated persons should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to a Director.

If the public official provides written details, a Director will consider the nature of the payment. Local legal advice may be sought by the Practice.

If it is concluded that the payment is a legitimate fee, for example part of a legitimate part of a genuine fast-track process, or is permitted locally, the Business will authorize the employee to make such a payment.

Where a Director considers that the request is for a facilitation payment, the employees or associated person will be instructed to refuse to make the payment and notify the public official that the employee or associated person is required to report the matter to the Business and the UK Embassy if applicable. Maple People Limited will seek the assistance of the relevant employee in its investigation and may determine that the matter should be referred to the prosecution authorities.

If an employee or associated person has any other concerns about the matter of a request for payment, he/she should report it to a Director using the reporting procedure set out in this policy.

## **7.0 Corporate Entertainment Gifts, Hospitality and Promotional Expenditure**

Maple People Limited permits the corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken.

- For the purpose of establishing good business relationships
- To improve the image and reputation of the Business OR
- To present the Practices' services effectively provided that it is:
- Arranged in good faith and
- Not offered, promised or accepted to secure an advantage for the Practices' or any of its employees or associated persons or to influence the impartiality of the recipient.

The Business will approve business entertainment proposals only if they demonstrate clear business objective and are appropriate for the nature of the business relationship. Any conflict of interest that may arise or where it could be perceived that undue influence or a particular business benefit was being sought would result in denial of the request.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior approval from the Directors is required. These will be authorized in limited circumstances. This principle applies to the employees and associated persons, whether based in the UK or overseas.

Employees and, where relevant associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the Directors. Records and receipts must be provided in accordance with the Practices Expenses policy.

The following will be considered:

- The objective of the proposed client entertainment or expenditure.
- The identity of those in attendance
- The organization that they will represent
- Details and rationale of the proposed activity.

## **8.0 What Practices Are Permitted?**

This policy does NOT prohibit:

- Normal and where appropriate hospitality and entertainment with clients in line within the acceptable realms of Business and expenses policy.

- The use of any recognized fast-track process that is publicly available on a payment of a fee. Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

## 9.0 Risk Management

Maple People Limited has risk management procedures to prevent, detect and prohibit bribery. The Business will conduct risk assessments for each of its key business activities on a regular basis and, where relevant, will identify employees or associated persons who are in positions of vulnerability and may be exposed to bribery.

The Business will identify high -risk areas within a project and where necessary a bribery risk assessment will be done. This will sometimes be as basic as someone flagging a potential issue to a full-scale assessment done by the Directors when commencing a new project.

The company will:

- Monitor 'at-risk' employees and associated persons.
- Regularly communicate with 'at-risk' employees and associated persons.
- Undertake extensive due diligence of third parties and associated persons; and
- Communicate its zero-tolerance approach to bribery to third parties, including actual and prospective customers, suppliers and joint-venture partners.

## 10.0. Reporting Suspected Bribery

Maple People Limited has a responsibility to help detect; prevent and report instances of bribery. Employees and associated persons are requested to raise concerns to the Directors as soon as possible; if you believe or suspect that a conflict with this policy has occurred or may occur in the future. Issues that should be reported include:

Any suspected or actual attempts of bribery

- Concerns that other employees or associated persons may be bribed OR
- Concerns that other employees or associated person may be bribing third parties, such as clients or government officials.

In the event of any concern the first course of action is to report directly to a Director who will take notes and any other evidence presented for further investigation. Anybody reporting such incidences or suspected incidences in good faith will be supported by the Practice and their identity will be kept confidential wherever possible.

If for any reason a Director is suspected of such behavior then the next person in line will need to be approached. The line of reporting will not be affected by seniority in this case.

## 11.0. Action By The Practice

The Business will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. The Business will invoke its disciplinary procedures where any employee is suspected of bribery and proven allegations may result in a finding of gross misconduct and immediate dismissal.

Maple People Limited may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, the Business who are found to have breached this policy.

Maple People Limited may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, and the Police. The Business will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

### 12.0. Review Of Procedures And Training

The Business will regularly communicate its anti-bribery measures to employees and associated persons. The Business will set up training sessions where applicable. The Directors are responsible to provide the necessary financial and physical resources for the implementation of this policy.

The Directors will monitor and review the implementation of this policy and related procedures annually and where necessary review at other times if any changes occur in between times to ensure it remains relevant and appropriate.

Employees and those working for, or on behalf of the Business are encouraged to contact the Directors with any suggestions, comments or feedback that they have on how these procedures can be improved.

Maple People Limited reserves the right to amend and update the policy as required. Every employee and associated persons where applicable is aware of this policy and have signed a copy which is kept on record.

Saj Rahman _____ Founder & CEO	 _____ Signature	01.05.2019 _____ Date
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### 13.0 Staff Declaration

I hereby acknowledge that I have read, understood and will comply with Maple People Limited's Anti-bribery and Corruption policy.

Signature .....

Name ..... Date.....