

## Annex I - Highways England's Anti Bribery Code of Conduct



### Highways England Anti Bribery Code of Conduct

Highways England, working with its suppliers in good faith and in a spirit of mutual trust and respect, is committed to meeting the principles of anti-bribery, as enacted in the Bribery Act 2010 and Ministry of Justice guidance.

#### The Commitment

As a supplier to Highways England we confirm that we will meet the commitments set out below and will embed the principles throughout our supply chain.

1. We are committed to ensuring that our business operates with the utmost integrity.
2. We, and those employed by us will not:
  - Offer, promise, pay or provide bribes\* to any person
  - Request, agree to accept or receive bribes
  - Offer hospitality to Highways England's staff that would breach the requirements of Annex A
  - Commit any act of bribery that would cause Highways England to be in breach of any anti bribery laws
3. We are committed to having robust procedures and controls in place within our business to minimize the risk of bribery with the aim of preventing bribery and confirm that we:
  - Have a zero-tolerance of bribery offences throughout our organisation;
  - Conduct risk assessments to identify and monitor potential bribery risks;
  - Adopt due diligence measures to vet and approve third parties performing services on our behalf;
  - Have clear, practical and accessible policies and procedures to address potential risks of bribery, and to prevent bribery;
  - Provide education and awareness to all our employees on anti-bribery
  - Have a mechanism in place to allow employees to report potential bribery issues in confidence and have a process to deal with reports protecting the reporting individual;
  - Deal effectively with any occurrences of bribery; and
  - Act at all times in good faith, impartially and in accordance with a position of trust.
4. We agree to:
  - keep accurate and up to date records showing all payments made and received and all other advantages given and received and permit Highways England to inspect those records as required; and
  - Immediately notify Highways England of any breach of paragraph 2 above.

\* A bribe for this purpose being the provision of any financial or other advantage to encourage or induce that person to perform their functions or activities improperly or to reward that person for having already done so. Bribes can include money, gifts, hospitality, entertaining,

commissions, expenses, reciprocal favours, political or charitable contributions, or any direct or indirect benefit or consideration.

Company name	Representatives name	Signature
.....	.....	.....
	Position	Date
	.....	.....

**Anti-bribery code annex A**

Offer no -

- Gifts other than low-value items such as diaries or calendars (up to £10 in value). Calendars, diaries or other small items of office equipment may be offered and accepted but the gift must bear the company's name or insignia and can legitimately be regarded as being in the nature of advertising material
- Benefits and/or hospitality and / or entertainment such as cocktail parties, meals, receptions, presentations and conferences; and also invitations to social, cultural and sporting events
- overnight accommodation and travel to and from a venue at which an event is being held