

Policy to Prevent Acts of Bribery in Accordance with the Bribery Act 2010.

The Bribery Act 2010 entered into force on 1st July 2011.

“Bribery blights lives. Its immediate victims include firms that lose out unfairly. The wider victims are government and society, undermined by a weakened rule of law and damaged social and economic development. At stake is the principle of free and fair competition, which stands diminished by each bribe offered or accepted.”

Kenneth Clarke: Secretary of State for Justice - March 2011.

The following details the procedures which Anthony Keith Architects Ltd have put into place to prevent persons associated with them from bribing.

Anthony Keith Architects Ltd anti-bribery stance is communicated to all staff and provided to all clients as part of our standard terms and conditions are detailed as below:

Anthony Keith Architects Ltd Anti-bribery Stance.

- Anthony Keith Architects Ltd has a commitment to carry out business fairly, honestly and openly.
- Anthony Keith Architects Ltd has a commitment to zero tolerance towards bribery.

Anthony Keith Architects Ltd Prevention of Bribery Policy:

General:

- This policy is circulated to all employees. As such, all employees are aware that The Act creates a new offence under section 7 which can be committed by commercial organisations which fail to prevent persons associated with them from committing bribery on their behalf.
- The Act contains two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery) at sections 1 and 2 respectively. It also sets out two further offences which specifically address commercial bribery. Section 6 of the Act creates an offence relating to bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business², and section 7 creates a new form of corporate liability for failing to prevent bribery on behalf of a commercial organisation.

Risk-based Approach:

- Anthony Keith Architects Ltd adopts a risk-based approach to managing bribery risks. Procedures are proportionate to the risks faced by an organisation. No policies or procedures are capable of detecting and preventing all bribery. A risk-based approach will, however, serve to focus the effort where it is needed and will have most impact.
- Anthony Keith Architects Ltd continually assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.

Top-level commitment:

- The top-level management of Anthony Keith Architects Ltd are committed to preventing bribery by persons associated with it. They foster a culture within the organisation in which bribery is never acceptable.
- Procedures:
 - (1) Communication of the organisation's anti-bribery stance, and
 - (2) An appropriate degree of involvement in developing bribery prevention procedures.Philip Wilson is the Director in charge of the development and implementation of the organisation's bribery prevention procedures.

Facilitation payments:

- Anthony Keith Architects Ltd has a policy of non-payment of facilitation payments.

Hospitality and Promotional expenditure:

- Anthony Keith Architects Ltd is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure.
- Anthony Keith Architects Ltd has a policy that any hospitality should reflect a desire to cement good relations and show appreciation, and that promotional expenditure should seek to improve the image of Anthony Keith Architects Ltd as a commercial organisation, to better present its services, or establish cordial relations
- It is Anthony Keith Architects Ltd's policy that any recipient should not be given the impression that they are under an obligation to confer any business advantage or that the recipient's independence will be affected.
- It is Anthony Keith Architects Ltd's policy that all Hospitality and Promotional expenditure must be fully documented and accounted.

Business Benefits of Rejecting Bribery:

- Anthony Keith Architects Ltd view the business benefits of rejecting bribery (reputational, customer and business partner confidence) as significant and key to its continued success.

Due diligence:

- Anthony Keith Architects Ltd applies due diligence procedures, taking a proportionate and risk based approach, in respect of persons who perform or will perform services for or on behalf of the organisation, in order to mitigate identified bribery risks.

Communication:

- Anthony Keith Architects Ltd seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication.

Monitoring and review:

- As with all its internal procedures, Anthony Keith Architects Ltd monitors and reviews procedures designed to prevent bribery by persons associated with it and makes improvements where necessary.



The Architects Code:

- All the directors of Anthony Keith Architects Ltd are registered with the Architects Registration Board:
As such they and the practice are committed to "The Architects Code".
The latest version of The Architects Code: Standards of Conduct and Practice came into effect on 1 January 2010.
The following standards to which Anthony Keith Architects are committed to abide by are directly relevant in The Prevention of Acts of Bribery in Accordance with the Bribery Act 2010.
" Standard 1 - Be honest and act with integrity:
1.1 – You are expected at all times to act with honesty and integrity and to avoid any actions or situations which are inconsistent with your professional obligations. This standard underpins the Code and will be taken to be required in any consideration of your conduct under any of the other standards.
1.3 Where a conflict of interest arises you are expected to disclose it in writing and manage it to the satisfaction of all affected parties. You should seek written confirmation that all parties involved give their informed consent to your continuing to act. Where this consent is not received you should cease acting for one or more of the parties."

RIBA Code of Professional Conduct:

- All the Directors of Anthony Keith Architects Ltd are registered with the RIBA and the practice as a whole has RIBA Chartered status.
As such they and the practice are committed to the "RIBA Code of Professional Conduct".
The current Code of Professional Conduct (below) came into effect on 1 January 2005. It is supported by a series of nine guidance notes.
The following Principles to which Anthony Keith Architects are committed to abide by are directly relevant in The Prevention of Acts of Bribery in Accordance with the Bribery Act 2010.
"1. Principle 1 – Honesty and Integrity:
1.1 The Royal Institute expects its Members to act with impartiality, responsibility and truthfulness at all times in their professional and business activities.
1.2 Members should not allow themselves to be improperly influenced either by their own, or others', self-interest.
1.4 Members should avoid conflicts of interest. If a conflict arises, they should declare it to those parties affected and either remove its cause, or withdraw from that situation. .
1.6 Members should not offer or take bribes in connection with their professional work."

This Policy is communicated to all employees, suppliers and sub-contractors and is made available to the public.

Daniel Cogdon: 
Director

Date: 3rd January 2018

