

Anti-Bribery and Corruption Policy

Seer Computing is an independent Computer Consultancy specialising in high end IT solutions, training and consultancy. Seer Computing has been in existence for over twenty years and prides itself on its reputation with its clients and customers.

This Anti-Bribery and Corruption Policy will on occasion be updated and refined but will always reflect the genuine concerns Seer Computing have to maintain a reputation second to none.

Policy Statement

It is Seer Computing Ltd's ("The Company") policy to conduct its business in an honest and ethical manner.

The Company takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships wherever it operates, and implementing and enforcing effective systems to counter bribery.

Purpose

The Company will uphold all laws relevant to countering bribery and corruption including the Bribery

Act 2010 ("the Act"), in respect of its conduct both in the UK and abroad.

The purpose of this policy is to set out the responsibilities of the Company, and of those working for it, in observing and upholding our position on bribery and corruption; and to provide information and guidance to those working for the Company on how to recognise and deal with bribery and corruption issues.

Bribery and corruption is punishable for individuals by up to ten years' imprisonment and if the Company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for public contracts and face damage to its reputation. The Company therefore takes its legal responsibilities very seriously.

Scope and applicability

This policy applies to all individuals working for or on behalf of the Company at all levels and responsibilities, whether permanent, contract, fixed-term or temporary, and wherever located, including consultants, contractors, seconded staff, casual staff, agency staff, volunteers, agents, sponsors and any other person who performs services for or on behalf of the Company ("Operatives").

In this policy, Third Party means any individual or organisation that Operatives come into contact with during the course of work and the running of the Company's business, this includes actual and potential clients, intermediaries, referrers of work, suppliers, distributors, business contacts, agents, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.

Definition of Bribery

A bribe is an inducement or reward offered, promised or provided in order to gain commercial, contractual, regulatory or personal advantage.

The Company may also be liable under the Act if it fails to prevent bribery by an associated person (including, but not limited to Operatives) for the Company's benefit.

Gifts and Hospitality

The Company will register any gifts or hospitality given or received with an estimated value in excess of £100.

Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior written approval of

the Company. Any such gifts must be registered regardless of value.

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships or improving or maintaining the Company's reputation or image.

The Company has specific internal policies and procedures which provide guidance to Operatives as to what is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits, subject to the principles set out below, namely that any gift or hospitality:

- Cannot not be made with the intention of improperly influencing a Third Party 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.
- Must comply with local law in all relevant countries.
- Must be given in the name of the Company, not in an Operative's name.
- Cannot not include cash or a cash equivalent.
- Must be appropriate in the circumstances.

- Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift.
- Must be given openly and not secretly.

The Company appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered.

It is not acceptable for any Operative (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the Firm 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 Firm in return.
- threaten or retaliate against another Operative who has refused to commit a bribery offence or who has raised concerns under this policy.
- engage in any activity that might lead to a breach of this policy.

Facilitation payments and “kickbacks”

The Company do not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

Charitable Donations and Sponsorship

The Company only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with the Company's internal policies and procedures.

Responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company. All Operatives are required to avoid any activity that might lead to, or suggest, a breach of this policy

Operatives are required to notify the Company as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any Operative who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee Operatives if they breach this policy.

If any Third Party is aware of any activity by any Operative which might lead to, or suggest, a breach of this policy, they should raise their concerns by email to antibribery@seercomputing.com