

## Anti-Bribery Policy

February 2022

The Ministry of Justice (MoJ) has issued guidance in relation to the Bribery Act 2010, containing six principles to be followed by companies in relation to Anti-bribery provisions. Companies should consider: -

- Proportionate Procedures
- Top-level Commitment
- Risk Assessment
- Due Diligence
- Communication (including training)
- and Monitoring & Review

This policy considers these headings in the context of DBA's operations.

### Context

Advice on the subject acknowledges that *'many organisations will face little or no risk of bribery, especially if their business is undertaken primarily in the UK. If there is very little risk of bribery being committed on behalf of your organisation then you may not feel the need for any procedures to prevent bribery'*.

The MoJ guidance states that, *'There is no need for extensive written documentation or policies. You may already have proportionate procedures through existing controls over company expenditure, accounting and commercial or agent contracts for example'*.

A review of this issue in relation to DBA's operations indicates that these can be considered to be low-risk in terms of the likelihood of bribery being an issue, for the following main reasons: -

- DBA's operations are confined to the United Kingdom,
- DBA does not bid for large infrastructure projects in either the public or private sector,
- DBA does deal directly with procurement managers other than through communication through approved channels that are open to scrutiny,
- DBA's internal financial procedures and controls require dual approval of expenditure above a low threshold figure,
- DBA does not engage to any significant degree in personalised entertainment of clients and contacts

On the basis of these considerations, DBA has developed the following Policy Statement, based on the example of a statement provided by Transparency International.

Managing Director: F Adams  
Directors: A Ferns, S Harrow, S Macphail  
Associates: B Sim, C Weir



## Policy Statement

Dougall Baillie Associates has a policy of zero tolerance of bribery and corruption. This policy extends to all of the company's business dealings and transactions. This policy is given force through its adoption by the Board of Directors of the company, following an assessment of the guidance provided by the Ministry of Justice. All directors and employees are required to comply with this policy.

In its dealings, the company and its representatives will only engage in hospitality and promotional activities that are genuine, reasonable and proportionate, and will not engage in any such activity intended to influence and official in order to secure business or a business advantage.

Any employee becoming aware of such activity in relation to the company's dealings has a duty to advise a director.

Signed:



Date: 02/02/22

(Director)

