

Anti-Bribery and Corruption Policy

Why do we have a policy?

Future is committed to ensuring that our business is conducted according to ethical, professional and legal standards in a fair, honest and open manner. This policy explains what bribery and corruption are and what the responsibilities are for all colleagues so there is clarity for all.

Who does this policy apply to?

This policy applies to all colleagues of Future Publishing Limited. All other third parties who work on behalf of Future including Freelancers, agency workers and self-employed consultants are also expected to abide by the principles set out in this policy..

Colleagues are defined as those who have a contract of employment with Future Publishing Limited.

This policy is designed to work in conjunction with our Whistleblowing, Conflict of Interest, Anti-Slavery and Human Trafficking Policies.

This policy does not form part of colleagues' contracts of employment and the Company may change this policy at any time.

General Principles

Future operates a zero tolerance policy in respect of improper or criminal behaviours. The Company will never authorise or condone the direct or indirect offering, payment, gift or receipt of any improper financial or other advantage in respect of Company business. The consequences of Company or colleague involvement are not just breaches of law but can also have a huge impact on the reputation of Future with its clients, customers and the marketplace.

Forms of bribery and corruption include:

- The direct or indirect promise, offering or authorisation of anything of value.
- The offer or receipt of any kickback, loan, fee, reward or other advantage.
- The giving of aid, donations or voting designed to exert improper influence.
- Payments for lavish or inappropriate entertainment or travel including sporting events.
- Favours including offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

The Company opposes all forms of bribery and corruption. This is regardless of value, whether initiated by corrupt officials, companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

The Bribery Act 2010 came into force in July 2011 and primarily covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of colleagues and associated persons acting for or on behalf of the Company;
- the consequences of any breach of this policy.

Compliant with UK anti-corruption legislation, the Bribery Act 2010 exposes Future, its Directors, Managers, colleagues and workers to liability which could result in:

- Individuals being jailed for up to 10 years and receiving an unlimited fine whilst Future may receive a criminal conviction and an unlimited fine;
- Any Director convicted of a bribery offence could be disqualified from holding a Director position for up to 15 years;
- Future and individuals found guilty of corruption facing mandatory perpetual exclusion from tendering for public contracts under the EU Directive 2004;
- Senior Officers and Directors can also be found guilty under section 172 of the Companies Act 2006, failing in their duty to promote the success of the Company.

What is a Bribe?

“The intention 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” (Bribery Act 2010).

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

- A colleague or associated person acting for or on behalf of the Company offers, promises, gives, requests, receives or agrees to receive a bribe;
- A colleague or associated person acting for or on behalf of the company offers, promises or gives bribes to a foreign public official with the intention of influencing the official in the performance of his/her duties;
- The Company does not have a defence that is adequate or have procedures in place to prevent bribery by its colleagues or associated persons.

Procedure

To adhere to the policy, we will:

- Ensure all colleagues are provided with training on this policy on anti-bribery and corruption so they can recognise the signs and take steps to avoid it.
- Encourage colleagues, subcontractors and business partners to report any suspicions of bribery and/or corruption through formal ‘whistleblowing’ channels or more informally through our ‘open door’ policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment.

- Have an understanding of how bribery may occur during the Company's operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence.
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Continue to constantly monitor and regularly review this Anti-Bribery and Corruption Policy in order to ensure our continuing compliance.
- Undertake monitoring of colleague expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all colleagues.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

Company Records

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

Colleagues and associated persons are required to keep accurate, detailed and up to date records of all corporate hospitality, entertainment or gifts accepted or offered, in line with Gifts & Hospitality policy.

Corporate Hospitality

Future does permit (without express written consent from the colleague's divisional Director as noted below) corporate entertainment, gifts, hospitality or promotional expenditure for the reasons of:

- Establishing or maintaining good business relationships.
- Improving the image and reputation of the Company.
- Presenting the Company's goods/services effectively.

Provided that it is:

- Arranged in good faith and approved in advance by the colleague's divisional Director;
- Not offered, promised or accepted to secure advantage for the Company or any of its colleagues or associated persons to influence the impartiality of the recipient or encourage them to perform the activities or reward that person for having done so.

Supplier and Partner Due Diligence

All colleagues and associated persons are reminded that the selection process of supplier and partners should be fair, transparent and conducted at arm's length. The colleague must check due diligence has been carried out before:

- appointing a new supplier.
- entering into a partnership.
- appointing an agent to work on the Company's behalf.
- entering into a new contract/or amending the terms of an existing contract.

Reporting Suspected Bribery

Future depends on our colleagues to ensure the highest standards of ethical conduct are maintained in all its business dealings; they have a responsibility to report and act on attempted bribery or corruption in line with this policy.

Colleagues and associated persons are encouraged to report any concerns they may have with regards to actual attempts of bribery, someone being bribed, or bribes being offered to third parties.

Colleagues are reminded that the Company has a Whistleblowing policy which can be utilised in the event they have any concerns discussing an issue relating to bribery or corruption. Colleagues or associated persons who report instances of bribery in good faith will be supported by the Company and Future will ensure the individual is not subjected to any detrimental treatment as a consequence of his/her report.

Any suspected or alleged instances of bribery will be fully investigated and the colleague may be subject to the Disciplinary policy and procedure, up to and including dismissal.

Future may also report any matter to relevant authorities and provide any necessary assistance in any subsequent prosecution.

If a colleague is in any doubt about the application of this policy, they should contact their line manager, People or an ELT member.

Want to know more?

If you have any questions in relation to this policy, please contact People and Culture at peopleandculture@futurenet.com for further information.

Issue and Amendment Record

Version No	Date	Author	Amendment
3.0	August 2021	Bethan Bailey	Annual review: updated policy references & layout, corrected grammatical errors.