

Anti-bribery Policy

Portal Security Ltd requires its staff and other persons who provide or perform a service for or on behalf of PS, at all times to act honestly and with integrity and to safeguard the PS resources for which they are responsible.

PS is committed to ensuring that its business is conducted in an open and transparent manner, will adhere to the six principles of bribery prevention outlined in the Governments guidance, and it will take all appropriate steps to address the risks of bribery.

PS condemns all acts of bribery or corruption; any cases brought to its attention will be investigated exhaustively and dealt with appropriately.

PS is committed to the highest international standards of integrity and to ensuring it adheres to and promotes best practice in bribery prevention.

Bribery is commonly described as the offer or acceptance of a reward to persuade another to act dishonestly and or in breach of the law. It includes the offering, promising, giving, receiving or soliciting of a financial, or other advantage or favour as a means to influence the actions of an individual (or individuals).

The Bribery Act 2010 provides for 4 bribery offences:

- Bribing: offering, promising or giving an advantage;
- Being bribed: requesting, agreeing to or accepting an advantage;
- Bribing a foreign official;
- Failing as an organisation to prevent any person who performs services on its behalf from committing an act of bribery.

This Policy extends to all PS activities and operations and to all of its dealings and negotiations with third parties in all countries in which staff, and other persons who provide or perform a service for or on behalf of PSS operate. All staff and other persons who provide or perform a service for or on behalf of PSS are required to comply with this policy.

All cases of actual or suspected bribery will be vigorously and promptly investigated and appropriate action will be taken. The police will be informed where considered appropriate. Disciplinary action will be considered, not only against any staff found to have perpetrated bribery, but also against staff managers whose negligence is held to have facilitated or condoned an act of bribery. Both categories may constitute gross misconduct, the penalty for which may include summary dismissal.

Signed: Declan Goldie

Director

Issue Date: 04/08/13

Last Review Date: 02/03/2020

This policy will be reviewed annually or, if significant changes occur, to ensure its continuing suitability, adequacy and effectiveness. The review will be carried out by the Quality Manager and the date of last review recorded.