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Bribery Act 2010

Risk and Policy for Worldwide International Ltd

What is Bribery? Defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that someone for having done so. Generally considered as offering an incentive to get business that might not have been placed with you otherwise for example, during a tender, offering money, expensive gifts to try and gain favour. Also included is Facilitation payments, which are payments to induce officials to perform routine functions they are otherwise obligated to do. For example, offering a customs official an incentive, eg gift, or money for clearing our goods quicker.

Risk? We have low risk, we work in a relatively cash free environment, where all expenses are examined and are fully documented. Although business is carried out overseas, we work with reputable companies and have long standing relationships, within our well established supply chain our relationships are long standing, our business flows very regularly, and the rates are negotiated contract rates which are documented. Lower value goods (books) with low duties and taxes do not attract facilitation payments from overseas officials.

Hospitality, Promotional, charity expenditure? This is permitted under the act, tickets to sporting events, dinner, gifts, are all acceptable providing that they are proportionate to the business. Sending someone on a weeks holiday to the Caribbean when they spend £20k a year would be considered dis-proportionate. However a £50 wine voucher would be OK.

Policy – Worldwide International T/A Publiship does not tolerate bribery in any form. No employee or employee of another company representing WWI/Publiship should ever offer any incentive that may be construed as a bribe or an attempt to gain an unfair advantage. Similarly, no employee or employee of another company should ever accept any offer or incentive that may be construed as a bribe or an attempt to gain an unfair advantage.

If at any point you are unsure of whether a gift may be in breach of the bribery act, you should consult with a company director before giving/receiving. Similarly if you suspect any of our representatives to be breaching this policy then you should notify a company director.

SUE KELLY
Operations Director
Last updated January 2023