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# Anti-Bribery & Anti-Corruption Policy

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SEPTIMIUS SECURITY  
Security & Safety Services

# Septimius Security: Anti-Bribery & Anti-Corruption Policy

## Version 1



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## 1. Introduction:

- This anti-bribery policy exists to set out the responsibilities of Septimius Security Ltd and those who work for us in regards to observing and upholding our **zero-tolerance** position on bribery and corruption.
- It also exists to act as a source of information and guidance for those working for Precise Fire & Security Ltd. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Policy Statement:

- Septimius Security Ltd is omitted to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Precise Fire & Security has a zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever in the Country we operate.
- Septimius Security Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the Ireland, including the Criminal Justice (Corruption Offences) Act 2018, in regards to our conduct both at home and abroad.
- Septimius Security Ltd recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contacts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.



### **3. Who does the policy apply to and cover?**

- This anti-bribery policy applies to all employees (whether temporary, fixed term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the Ireland). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.
- In the context of this policy, third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors and government and public bodies – this includes their advisors, representatives and officials, politicians and public parties.
- Any arrangements or company makes with a third party is subject to clear contractual terms, including specific provision that require the third party to comply with the minimum standards and procedures relating to anti-bribery and corruption.

### **4. Definition of bribery:**

- Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence an action or decision.
- A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- Bribery is not limited to the act of offering a bribe. If an individual on the receiving end of a bribe and they accept it, they are also breaking the law.
- Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.



## **5. What is and what is NOT acceptable**

- This section of the policy refers to four areas:
  - Gifts and hospitality.
  - Facilitation payments.
  - Political contributions.
  - Charitable contributions.

### **5.1. Gifts:**

- Septimius Security Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:
  - It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for benefits or favours.
  - It is not made with the suggestion that a return favour is expected.
  - It is in compliance with local law.
  - It is given in the name of the company, not in an individual's name.
  - This does not include cash or a cash equivalent (e.g., a voucher or gift certificate).
  - If it is appropriate for the circumstances (e.g., giving a small gift around Christmas or as a small thank you to a company for helping with a large project upon completion).
  - It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
  - It is given/received openly, not secretly.
  - It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
  - It is not above a certain excessive value as predetermined by the company's compliance manager (this usually includes gifts to the value of Euro 100).
  - It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.



- Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.
- Septimius Security Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- As a good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.
- The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

## **5.2. Facilitation Payments and Kickbacks:**

- Septimius Security Ltd does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.
- Septimius Security Ltd does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.
- Septimius Security Ltd recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstance, the following steps must be taken:
  - Keep any amount to the minimum.
  - Ask for a receipt, detailing the amount and reason for the payment.
  - Create a record concerning the payment.
  - Report this incident to your line manager.



- Septimius Security Ltd will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.
- Septimius Security Ltd accepts and indeed encourages the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable donations it makes.
- Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

## **6. Employee Responsibilities:**

- As an employee of Septimius Security Ltd, you must ensure that you read, understand and comply with all the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.
- If any employee breached this policy, they will face disciplinary action and could face dismissal for gross misconduct. Septimius Security Ltd has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.



## **7. What if I need to express a concern?**

- This section of the policy covers three areas:
  - How to raise a concern.
  - What to do if you are a victim of bribery or corruption.
  - Protection.

### **7.1. How to raise a concern:**

- If you suspect that there is an instance of bribery or corrupt activities occurring in relation to Septimius Security Ltd, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, the director or General Manager.
- Septimius Security Ltd will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

### **7.2. What should you do if you are a bribery or corruption victim?**

- You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

### **7.3. Protection:**

- If you refuse to accept or offer a briber or you report a concern relating to potential acts of bribery or corruption, Septimius Security Ltd understands that you may feel worried about potential repercussions. Septimius Security Ltd will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.





- Septimius Security Ltd will ensure that no one suffers and detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because the reported a concern relating to a potential act of bribery or corruption.
- Detrimental treatment refers to dismissal, disciplinary action, treats or unfavourable treatment in relation to the concern that the individual raised.
- If you have reason to believe you have been subject to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the compliance manager immediately.

## **8. Training:**

- Septimius Security Ltd will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually for formally accept that they will comply with this policy, discussed in Section 15.
- Septimius Security Ltd 's anti-bribery and corruption policy and zero tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.
- Septimius Security Ltd will provide relevant anti-bribery and corruption training to employees etc., where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

## **9. Record Keeping:**

- Septimius Security Ltd will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality are subject to managerial review.



## 10. Risk Assessments

- Standard business risk assessments will be conducted on an annual basis to determine the level of controls necessary for a particular aspect of the Septimius Security Ltd operations, including in relation to procurement and tender processes.
  - "Country risk", which includes an assessment of the overall risks of corruption and bribery associated with a particular jurisdiction.
  - "Transactional risks", which includes an assessment of the risks associated with a business transaction undertaken by the Company or its Associated Entities.
  - "Business opportunity risks", which includes the risk that pursuing or obtaining business opportunities may result in acts of bribery or corruption; and
  - "Business partnership risks", which includes risks deriving from relationships with or partnership with other Associated Entities.
- Specific policies and procedures will be adapted and implemented to proportionately address the risks identified above as they arise.
- Records and documentation must be kept of each risk assessment as part of the system of internal controls and record keeping discussed in Section 9.

## 11. Due Diligence:

- While the list is not exhaustive, and warning signs will vary by the nature of the transaction, expense/payment request, geographical market or business line, common warning signs that should be considered as part of any due diligence include:
  - that an Associated Entity has current business, family or some other close personal relationship with a customer or government official, has recently been a customer or government official or is qualified only on the basis of his influence over a customer or government official;
  - a customer or government official recommends or insists on the use of a certain business partner or Associated Entity;



- an Associated Entity refuses to agree to anti-corruption contractual terms, uses a shell company or other unorthodox corporate structure, insists on unusual or suspicious contracting procedures, refuses to divulge the identity of its owners, or requests that its agreement be backdated or altered in some way to falsify information;
  - an Associated Entity has a poor reputation or has faced allegations of bribes, kickbacks, fraud or other wrongdoing or has poor or non-existent third-party references;
  - an Associated Entity does not have an office, staff or qualifications adequate to perform the required services; or
  - an expense/payment request by an Associated Entity is unusual, is not supported by adequate documentation, is unusually large or disproportionate to products to be acquired, does not match the terms of a governing agreement, involves the use of cash or an off-the-books account, is in a jurisdiction outside the country in which services are provided or to be provided, or is in a form not in accordance with local laws.
- Records and documentation must be kept of due diligence as part of the system of internal controls and record keeping discussed in Section 9.

## **12. Responsibility Of Managers:**

- Managers will have full authority to implement the Policy within their spheres of responsibility. The measures taken by managers will be proportionate to the risks associated with their areas of responsibility but may include:
  - devising, implementing and maintaining systems and controls designed to prevent bribery, minimize the risk of bribery and detect instances of bribery;
  - ensuring that employees are aware of the Policy; and
  - ensuring that employees participate in anti-bribery training and that training specific to the needs of particular employees or job functions is provided when appropriate.
- A manager to whom an employee's concerns are expressed must act promptly and escalate the matter in accordance with this Policy.
- Where it is decided that further investigation is not appropriate the reporting employee must be given a prompt and full explanation of the reasons for reaching this conclusion.



### **13. Communication Of the Policy:**

- To ensure that all directors, officers, employees, consultants and contractors of Septimius Security Ltd are aware of the Policy, a copy of the Policy will be provided to them and they will be advised that the Policy is available on Septimius Security Ltd 's website for their review. All directors, officers, employees, consultants and contractors of Septimius Security Ltd will be informed whenever significant changes are made. New directors, officers, employees, consultants and contractors of Septimius Security Ltd will be provided with a copy of this Policy and will be educated about its importance.
- Training on this Policy will form part of the induction process for all new directors, officers, employees and consultants of Septimius Security Ltd. All existing directors, officers, employees and consultants will receive relevant training on how to implement and adhere to this Policy.
- Septimius Security Ltd 's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter. For advice on these communications, please contact the General Manager.

### **14. Responsibility For the Policy:**

- The Company's Board of Directors has overall responsibility for ensuring this Policy complies with Septimius Security Ltd 's legal and ethical obligations, and that all those under Septimius Security Ltd 's control comply with it.
- The Compliance Officer has primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness. Management at all levels is responsible for ensuring those reporting to them are made aware of and understand this Policy.

### **15. Annual Certification:**

- All directors, officers, employees, consultants and contractors of Septimius Security Ltd will provide annual certification of compliance with this Policy in the form available for review on Septimius Security Ltd 's website.



- The Chief Commercial Officer and/or Compliance Officer of Septimius Security Ltd will be responsible for ensuring that all annual certifications are obtained on or before the end of the first fiscal quarter of each year, and for providing written confirmation to the Board of Directors that such certifications have been obtained and summarizing the results thereof.

## **16. Monitoring and reviewing:**

- Septimius Security Ltd 's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy and effectiveness.
- Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.
- This policy does not form part of an employee's contract of employment and Septimius Security Ltd may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

## **17. Consequences Of Non-Compliance with The Policy:**

- Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action or termination of employment or consulting arrangements without notice. Violation of this Policy may also constitute a criminal offence under Irish, Libyan or Turkish laws, or any law within a country where Septimius Security Ltd operates in. If it appears in the opinion of the Board that any director, officer, employee, consultant or contractor of Septimius Security Ltd may have violated such laws, then Septimius Security Ltd may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for Septimius Security Ltd and/or the responsible person.



## 18. Personal Safety:

- The Company is engaged in conducting business in places where personal safety may not be guaranteed by local officials. If you are subjected to an immediate threat to personal safety, you may put your personal well-being first, even if it means that you make a payment that contravenes this Policy.
- The details of all incidents must be reported to the Compliance Officer immediately.

## 19. Queries:

- If you have any questions about how this Code should be followed in a particular case, please contact the Compliance Officer or the Chief Operating Officer of Septimius Security Ltd in the first instance on +218

## 20. Publication Of the Policy:

- This Policy will be posted on Septimius Security Ltd's website at [Septimius Security Ltd](#).

## 21. Acknowledgement:

- I (print name) \_\_\_\_\_ acknowledge that I have read, understood and agreed to comply with the Anti-Bribery & Anti-Corruption Policy. I have not violated the provisions of this Policy and am not aware of any violations of the Policy as of the date hereof.
- Signature: \_\_\_\_\_ Date: \_\_\_\_\_
- Directors and officers of the Company will be required to complete an annual acknowledgement certification.
- Original Approval Date:
- Approved by: