

Youco Anti-Corruption and Bribery Policy

1. Introduction

Youco is committed to conducting its business with integrity, transparency, and accountability. We adhere to the highest ethical standards and comply with all applicable laws and regulations, including the **Bribery Act 2010**. This policy outlines Youco's position on preventing and addressing corruption and bribery within our organisation and across our business relationships.

2. Purpose

The purpose of this policy is to:

- Define what constitutes bribery and corruption.
 - Set clear expectations and responsibilities to prevent bribery and corruption.
 - Outline procedures for reporting and addressing any suspected cases of bribery or corruption.
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3. Scope

This policy applies to all employees, contractors, consultants, suppliers, and any third parties working with or on behalf of **Youco**. It covers all activities undertaken in the UK and internationally, in any capacity, including:

- Permanent, temporary, and part-time employees.
 - Contractors, freelancers, and agency workers.
 - Business partners, agents, and suppliers.
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4. Definition of Bribery and Corruption

- **Bribery:** Offering, promising, giving, requesting, or receiving something of value as an inducement or reward for improper performance of a role or function. Bribery can take various forms, including cash, gifts, hospitality, or favours.
 - **Corruption:** Abuse of power or position for personal gain or to benefit others inappropriately. This includes any dishonest or fraudulent conduct.
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5. Policy Statement

Youco has a zero-tolerance approach to bribery and corruption. We will not engage in or tolerate any form of bribery, corruption, or unethical conduct in our business operations, and we are committed to preventing and detecting any such activity.

6. Responsibilities

- **Employees and Representatives:** All employees, contractors, and representatives of Youco are required to uphold this policy. Any individual involved in offering, giving, or accepting bribes or engaging in corrupt practices will face disciplinary action, which may include termination and potential legal consequences.
 - **Management:** Youco's management team is responsible for promoting a culture of integrity and compliance. They must ensure that employees understand the policy, participate in relevant training, and feel comfortable reporting any concerns.
 - **Suppliers and Partners:** We expect our suppliers, partners, and third parties to act with integrity and follow similar anti-bribery and corruption standards. Failure to adhere to this may result in termination of business relationships.
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7. Prohibited Actions

Under this policy, the following actions are strictly prohibited:

- **Bribery:** Offering, promising, giving, or accepting a bribe in any form.
 - **Facilitation Payments:** Small payments made to expedite routine government actions are also considered bribery and are strictly prohibited.
 - **Gifts and Hospitality:** Gifts, entertainment, or hospitality should not be offered or accepted if they may influence or be perceived as influencing a business decision. Gifts above a nominal value of £50 must be reported to the Compliance Officer.
 - **Charitable Donations:** All charitable donations must be approved by senior management and must not be used as a substitute for bribery or other corrupt practices.
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8. Procedures

- **Due Diligence:** Youco will conduct due diligence on potential partners, suppliers, and agents to ensure they uphold similar anti-bribery and corruption standards.
 - **Record-Keeping:** Accurate and complete records of all transactions, including expenses, gifts, and hospitality, must be maintained. All records should comply with legal and regulatory requirements.
 - **Monitoring and Audits:** Regular internal audits and monitoring processes will be conducted to ensure compliance with this policy and identify any areas of risk.
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9. Reporting Suspected Bribery or Corruption

Employees and representatives are encouraged to report any suspected cases of bribery or corruption promptly. Reports can be made to:

- **Direct Line Manager:** If you feel comfortable reporting to your immediate manager.
- **Compliance Officer:** If you prefer to report directly, please contact the Compliance Officer at compliance@youco.com.

All reports will be treated confidentially, and **Youco** will not tolerate any retaliation against employees who report concerns in good faith.

10. Consequences of Non-Compliance

Failure to comply with this policy may result in disciplinary action, including termination of employment or contracts. In cases of severe non-compliance, Youco may refer the matter to law enforcement authorities, which may result in criminal charges under the **Bribery Act 2010**.

11. Policy Review

This policy will be reviewed annually or when there are significant changes in applicable laws or regulations. Any updates to the policy will be communicated to all employees, contractors, and relevant third parties.

12. Contact Information

For questions or concerns regarding this policy, please contact:

Compliance Officer

Email: compliance@youco.com

Phone: 01895 746335

This **Anti-Corruption and Bribery Policy** ensures that **Youco** operates with the highest standards of integrity and accountability. We are committed to preventing any form of bribery and corruption within our organisation and supply chain.