

Policy Name: Anti-bribery Policy
Version Number: V1
Date: March 2020



Anti-bribery Policy

Podium Analytics prohibits the offering, the giving, the solicitation or the acceptance of a bribe or improper inducement, whether cash or other inducement, to or from any person or company wherever they are situated, in order to gain personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual. Podium Analytics is committed to the prevention, deterrence and detection of bribery and will inform the police and any other relevant authority of any bribe or improper inducement of which it may become aware by any individual, employee, agent or other person acting on behalf of Podium Analytics.

Introduction

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage. Bribery is a criminal offence in many countries.

In particular, the UK Bribery Act 2010 sets out four categories of criminal offence as follows:

- Offering, promising or giving a bribe.
- Requesting, agreeing to receive or accepting a bribe.
- Bribing a foreign public official to obtain or retain business.
- Failing to prevent bribery.

The potential consequences of being convicted include criminal penalties for individuals (up to ten years in prison or an unlimited fine) and for Podium Analytics (unlimited fine).

This Policy has been approved by the Board of Trustees and applies to all employees working at the Podium Analytics, to the members of the Board and to any other persons associated with Podium Analytics (such as suppliers and contractors) ("Associated Persons"). It provides guidance in the prevention of bribery whilst acting in the course of employment or duties with Podium Analytics. It applies to all of Podium Analytics' activities. This Policy is to be read in conjunction with Podium Analytics' existing policies and contracts of employment.

The aims of this Policy are to:

- set out a clear anti-bribery policy
- make all employees, Board members and Associated Persons aware of their responsibilities to comply with this Policy to prevent bribery

To this end Podium Analytics is committed to:

- provide guidance for all employees and Board members to enable them to recognise and avoid the use of bribery by themselves and others;
- encourage vigilance and require the reporting any suspicion of bribery, providing suitable channels of communication and ensuring that sensitive information is treated appropriately;
- Rigorously investigate instances of alleged bribery and assisting the police and other appropriate authorities in any subsequent external investigation and resulting prosecution; and
- firm and vigorous action against any individual(s) involved in bribery

Podium Analytics requires its employees, Board members and Associated Persons to:

- read, understand and comply with this Policy
- act honestly and with integrity at all times and to safeguard the Podium Analytics' resources for which they are responsible
- avoid activity that breaches this Policy

An employee in breach of this Policy will face disciplinary action in accordance with the Podium Analytics' established disciplinary procedures and which may result in summary dismissal for gross misconduct; as well as facing possible civil and/or criminal prosecution.

An Associated Person in breach of this Policy who commits a bribery related offence or causes Podium Analytics to commit a bribery related offence will have their contract with Podium Analytics terminated.



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Anti-Bribery Compliance Officer

The Board has appointed the Finance and Business Operations Director as the Anti-Bribery Compliance Officer who has overall responsibility for Bribery Act compliance, including the implementation of anti-bribery measures and the investigation of alleged bribery.

Employees, Board members and Associated Persons should seek advice from the Anti-Bribery Compliance Officer in the first instance if they have any questions or concerns with regard to this Policy or its interpretation. The Anti-Bribery Compliance Officer will treat any questions or concerns raised with him/her on a confidential basis unless a breach of this Policy has been committed.

Gifts

This Policy does not prohibit Podium Analytics employees, Board members or Associated Persons from accepting normal and appropriate gifts, for example from the organisers of events.

A gift above the value of £250 arising from or connected with employment or involvement with Podium Analytics must not be accepted without first notifying the Chief Executive Officer and specifying the nature of the gift and the circumstance in which it is being offered.

If, in the reasonable opinion of the Chief Executive Officer, acceptance of the gift is inappropriate it must be declined (however gifts to the Chief Executive Officer must be notified to the Board of Trustees for their approval). The giving of a gift of modest value bearing the name or logo of Podium Analytics, or the receipt of such a modest value gift bearing the name or insignia of an organisation is acceptable.

If an employee is in doubt as to whether a potential act, invitation or gift constitutes bribery, then he/she should seek guidance from the Anti-Bribery Compliance Officer.

Hospitality and Entertainment

Normal and appropriate hospitality is considered an accepted part of Podium Analytics practice, such as the provision of entertainment and attendance at events to prospective sponsors or commercial partners. However, lavish corporate hospitality, such as restaurant meals, tickets to events, foreign travel invitations and costly presents, provided by Podium Analytics may be an offence under the Bribery Act 2010 if it is used to secure an improper advantage.

The acceptance by an employee of lavish hospitality provided by a third party may constitute a bribe or improper inducement. An invitation to what may be considered as lavish hospitality or entertainment must not accept the invitation without first notifying the Chief Executive Officer and specifying the nature of the gift and the circumstance in which it is being offered. If, in the reasonable opinion of the Chief Executive Officer, acceptance of the invitation is inappropriate it must be declined.

Discounts for Goods and Services

Discounts for goods or services offered by a supplier of goods or services to Podium Analytics must not be accepted by an employee as a personal benefit. All discounts from suppliers for orders made by purchase orders or on other contract agreements are acceptable provided that Podium Analytics itself receives the discount.

Register of Gifts and Benefits, including Hospitality and Entertainment

The Board of Trustees has decided to maintain a Register of Gifts and benefits given and received with a value in excess of £250.

All gifts and benefits (including hospitality or entertainment) given or received by Podium Analytics employees, Board members and Associated Persons of a value in excess of £250 arising from or connected with employment at the Podium Analytics or actions taken in behalf of the Podium Analytics must be notified in writing to the Anti-Bribery Compliance Officer with 7 days of the receipt of the gift or benefit. The Anti-Bribery Compliance Officer will record it in the Register of Gifts.



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The Register of Gifts will be reviewed by the Audit Committee annually on behalf of the Board as part of the monitoring process of the policy and its effectiveness.

Raising a Concern or “Whistleblowing”

All employees, Board members and Associated Persons have a responsibility to assist Podium Analytics in the prevention of bribery and to report any concern relating to a suspected instance of bribery or other inappropriate inducement. Podium Analytics is committed to providing employees, Board members and Associated Persons with a confidential and safe process for reporting any suspicion of bribery or inappropriate inducement or suspicious activity. Concerns or suspicions should be reported to the Anti-Bribery Compliance Officer who will treat this as confidential in the first instance.

The Anti-Bribery Compliance Officer will as soon as possible undertake an informal investigation to evaluate the report or concern and determine whether or not there is evidence to indicate potential wrongdoing. If wrongdoing is indicated, the Chief Executive Officer will be informed and he will make the decision as to whether to resolve the issue internally through the disciplinary process or to report it to the police or other external authority. Issues which may adversely affect the reputation of the Podium Analytics must be notified to the Board of Trustees.

The Board is committed to ensuring that nobody suffers detrimental treatment through refusing to accept or offer a bribe or other inducement, or because of reporting a concern or reasonable suspicion in good faith.

Monitoring

The Board of Trustees will monitor this Policy and the effectiveness of its procedures and the Board will undertake a triennial review of this Policy and any deficiencies noted will be remedied as soon as is reasonably practicable.

