
Anti Bribery, Corruption and Collusion Policy

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Checked by

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1.0 Purpose and Scope

- 1.1 Ryder Architecture Ltd has a zero tolerance policy towards all forms of bribery, corruption and collusion, fraud and malpractice. We comply with [The Bribery Act 2010](#) and [The Fraud Act 2006](#).
- 1.2 Whilst we respect the rules by which others conduct their own business, these are the principles by which we conduct our business:
- We will carry out our business fairly, honestly, openly and with integrity
 - We will not make bribes, nor will we condone the offering of bribes on our behalf
 - We will not accept bribes, nor will we agree to them being accepted on our behalf
 - We will avoid appointing others to provide services for us, or on our behalf, who do not share these principles and who may harm our reputation
 - Our colleagues have been informed of our anti bribery policy as part of their orientation, are aware of updates to procedures and know our principles
 - We regularly risk assess, review and update our programme and processes
 - We will at all times act with integrity and avoid conflict of interest and any actions or situations that are inconsistent with our professional obligations

2.0 Responsibilities

- 2.1 The managing partner takes ultimate responsibility for this policy.
- 2.2 The quality director is responsible for maintaining and implementing this policy.
- 2.3 All colleagues have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and to be alert for any indications or irregularity.
- 2.4 You must ensure that you have read and understood this policy and comply with its terms when acting on behalf of Ryder.

3.0 Procedure

- 3.1 Ryder recognises that any violation of fraud, anti bribery and corruption laws could subject the individuals to severe penalties including unlimited fines and imprisonment and could be deemed as gross misconduct.
- 3.2 Ryder requires the following to be implemented and maintained:
- Strict compliance with this policy
 - Implementation of an anti bribery programme and monitoring to mitigate risk
 - Implementation of a fraud and malpractice plan to ensure that timely and effective action is taken to mitigate risk and increase the chances of a successful investigation
 - Vigilance and reporting of any suspicion of fraud or bribery, immediately to the managing partner or a member of the business board
 - Rigorous investigation of any alleged fraud or bribery
 - Disciplinary action as outlined in the disciplinary policy against anyone involved in fraud or bribery

4.0 Glossary

4.1 Bribery, corruption and collusion

4.1.1 Bribery is “the giving, receiving, soliciting or promising of money, a gift or anything else of real or implied value as an inducement to do something that is dishonest, illegal or a breach of trust in order to secure business or a business advantage.”

4.1.2 Corruption is the misuse of entrusted power for personal gain.

4.1.3 Collusion involves people or companies which would typically compete against one another, but who conspire to work together to gain an unfair market advantage.

4.2 Fraud and malpractice

4.2.1 Fraud is a criminal offence and there are three offences:

- Fraud by false representation
- Fraud by failing to disclose information
- Fraud by abuse of position

4.2.2 Fraud is the deliberate action by a person; or allowing action to be taken by another and would include such acts as:

- Tax evasion
- Extortion
- Distorting business performance
- Causing loss to the Company, supplier or employee
- Prejudicing the Company’s competitive position or business reputation
- Money laundering
- Unauthorised release of confidential information
- Employment of illegal immigrants, those working under an assumed name or anyone unauthorised to work or carry out business in the UK.

4.2.3 In all cases, fraud includes the intention to carry out such fraudulent activity regardless of whether the individual eventually acts on this intention.

4.2.4 Malpractice, which can include fraud, covers both deliberate acts of commission and deliberate acts of omission. While there are intentional actions that may not be regarded criminally as fraudulent, they may however involve a grossly inappropriate use of company funds and / or resources.



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