



Stonbury are committed to conducting our business without the use of corrupt practises or acts of bribery.

We believe conducting business honestly and within the legislative framework is culturally and morally correct. Bribery is a criminal offence and corruption exposes the Company and its employees to legal action and damage to the Stonbury reputation and brand.

The Company encourages staff to use the “whistle blowing” procedure to report actual or suspected acts of bribery or corruption.

Stonbury has a risk based approach and has identified specific areas of potential elevated risk where additional controls are implemented.

#	Potential elevated risk areas	Controls for elevated risk
1	Stock control	Product will be counted each month and recorded. Annual Stock take shall be undertaken.
2	Fuel issue and use	Fuel use in cars and vans will be periodically checked as will mileage claims from Company Car and Grey Fleet drivers.
3	Commercial activity with family / friends	This activity shall be formally approved by directors and periodic audits undertaken.
4	Control of purchases and contractual arrangements	A procurement process is in place with defined spend levels and referral process if breached.
5	Gifts and Entertainment	Stonbury have in place a clear Gift and Entertainment Policy which identifies the acceptable and unacceptable levels of gifts, hospitality that can be received and accepted.
6	Engaging contractors	Stonbury has a dedicated process in regard to the engagement of contractors
7	Recruitment process	The company shall endeavour to use appropriate due diligence when engaging new staff during recruitment process.

The company will induct all relevant staff on this policy and will record and review non-conformance in relation to this Policy.

Signed by the Directors of Stonbury

Dated 31/10/2017

Next review date 31/10/2018