



Orion Investigations & Intelligence Ltd®

Anti Bribery Policy

1. Purpose

- 1.1. The purpose of this policy is to ensure Orion Investigations & Intelligence Ltd® compliance with UK anti bribery and corruption legislation and regulations.

2. The Law

- 2.1. The Bribery Act 2010 makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly.
- 2.2. The Bribery Act covers transactions that take place in the UK or abroad, and both in the public or private sectors.
- 2.3. Companies and partnerships can also commit an offence for failing to prevent bribery, where a bribe has been paid on their behalf by an "associated person".
- 2.4. "Associated persons" include employees, agents and any person performing services for or on behalf of the commercial organisation. In this case, *commercial organisation* means Orion Investigations & Intelligence Ltd®.
- 2.5. There is a defence available to this corporate offence to have "*adequate procedures*" in place to prevent bribery.

3. Bribery Definition

- 3.1. Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action (that the person does or omits to do) which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- 3.2. In general, if a person associated with a commercial organisation bribes a person with the intention of obtaining or retaining business or a business advantage for the commercial organisation, then the organisation may be guilty of an offence under the Bribery Act and liable for an unlimited fine.
- 3.3. Orion Investigations & Intelligence Ltd® will comply with the provisions of the Bribery Act 2010
- 3.4. It is extremely unlikely that hospitality intended to cement good business relations would engage this section, but hospitality is an area in which bribery is often involved.

4. Policy

- 4.1. Orion Investigations & Intelligence Ltd® is committed to acting professionally, and with integrity in all our business dealings and relationships with clients, potential clients, sub-contracted agents, and any other individuals or companies associated with us.
- 4.2. This Policy covers
 - Bribes
 - Gifts and hospitality
 - Facilitation payments
 - Political contributions
 - Charitable contributions

5. Bribes

- 5.1. Orion Investigations & Intelligence Ltd® Directors, Employees and Agents must not engage in any form of bribery, either directly or through any third party.

6. Gifts and hospitality

- 6.1. Orion Investigations & Intelligence Ltd® Directors, Employees and Agents must not offer or give any gift or hospitality which may be considered illegal or improper, including any value of individual gift or any value of hospitality event, unless approved in writing by the Orion Investigations & Intelligence Ltd® Directors.
- 6.2. Orion Investigations & Intelligence Ltd® Directors, Employees and Agents may not accept any gift, cash, or hospitality from our business partners:
 - of any value unless approved in writing by an Orion Investigations & Intelligence Ltd® Director; or
 - there is any suggestion that a return favour will be expected or implied from the proposing company or individual.
- 6.3. Note: It is extremely unlikely that hospitality such as the offer of a meal or a drink in the course of cementing good business relations will be considered a bribe. If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared as soon as practicable and donated to charity if it would be inappropriate to return the gift.
- 6.4. The practice of giving business gifts varies between cultures and countries. What may be normal and acceptable in one culture may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

7. Facilitation payments and kickbacks

- 7.1. Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.
- 7.2. Orion Investigations & Intelligence Ltd® has a strict policy that facilitation payments must not be paid.

8. Political Contributions

- 8.1. Orion Investigations & Intelligence Ltd® do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

9. Charitable contributions

- 9.1. Charitable support and donations are acceptable, whether it be in kind, services, knowledge, time, or direct financial contributions. However, Directors and employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. Orion Investigations & Intelligence Ltd® will only make charitable donations that are legal and ethical under UK Law. No donation must be offered or made without the prior approval of the Directors.

10. Record-keeping

- 10.1. Orion Investigations & Intelligence Ltd® will keep a written record of all hospitality or gifts accepted or offered.

ENDS

Policy Date: 26/11/ 2025

ORION