



4 Bloomsbury Square London WC1A 2RP

# QMULI ANTI-BRIBERY AND CORRUPTION POLICY

Date: **9 February 2023.**

Version: **4.00**

Reasons for update:

**Incorporation of Supplier Statement**

*Any copy of this Policy provided to non-Qmuli personnel  
will be redacted for legal, commercial or personal data protection purposes.*

© Qmuli Limited. February 2023.

© Qmuli Limited. Anti-Bribery & Corruption Policy. Feb 2023.

+44 (0) 20 7278 4009 ● [info@qmuli.com](mailto:info@qmuli.com) ● [www.qmuli.com](http://www.qmuli.com)

Registered in England: No. 06029892



4 Bloomsbury Square London WC1A 2RP

## CONTENTS

Section	Title	Page
1.	<i>Introduction to this Policy</i>	3
2.	<i>Organisational Structure, Business and Supply Chains</i>	3
3.	<i>Policy on Bribery and Corruption</i>	4
4.	<i>What is bribery?</i>	4
5.	<i>Gifts and Hospitality</i>	5
6.	<i>Individual Responsibilities</i>	5
7.	<i>Managing and Monitoring Compliance within Qmuli</i>	6
8.	<i>Managing and Monitoring Supplier Compliance</i>	6
9.	<i>Training &amp; Compliance Requirements Updates</i>	6
10.	<i>Policy Updates</i>	7
11.	<i>Director Sign Off</i>	7
	<i>Qmuli Anti-Bribery &amp; Corruption Supplier Statement</i>	8



4 Bloomsbury Square London WC1A 2RP

# ANTI-BRIBERY AND CORRUPTION POLICY

## 1. Introduction to this Policy

Qmuli values its reputation for ethical behaviour and for financial probity and reliability. It recognises that, over and above the commission of any crime, any involvement in bribery or corrupt practices will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery and corruption by:

- ◆ setting out a clear anti-bribery and corrupt practices policy;
- ◆ establishing and implementing anti-bribery and corruption procedures as appropriate;
- ◆ communicating this policy and any relevant procedures to employees and others who will perform services for Qmuli;
- ◆ undertaking appropriate due diligence measures before engaging others to represent or supply to Qmuli in its business dealings;
- ◆ monitoring and reviewing the risks and the effectiveness of any anti-bribery or corruption measures; and
- ◆ having devised and implemented procedures and working practices, ensuring these are monitored over time.

## 2. Organisational Structure, Business and Supply Chains

Qmuli provides a range of ad delivery services, ad production services and also sells its own developed solutions for assisting with the management and production of advertising and marketing materials.

Qmuli is a fully remote working company with all its staff and regular contractors working from their homes.

Qmuli has some 35 suppliers in total for all its business requirements. These comprise a mixture of small, medium and large companies, with the majority being large international companies such as Microsoft, whose Azure cloud-based service provides the core server infrastructure that underpins Qmuli's system offerings.

Qmuli has many clients. The majority of Qmuli's clients are companies that use its ad.fast ad delivery system and the Qmuli-client relationship in these instances is relatively 'hands off', with infrequent contact to ensure they are happy with Qmuli's offering and service, other than for regular information updates distributed via email.

There are also a number of clients to whom Qmuli provides production services beyond its ad.fast offering and a smaller number to whom Qmuli licences the use of its other production systems (such as ad.min+).



4 Bloomsbury Square London WC1A 2RP

The third batch of clients include publishers with whom Qmuli has a commercial arrangement under a Service Level Agreement (SLA) and a few companies with whom Qmuli has an ongoing working relationship that also requires an SLA.

### 3. Policy on Bribery and Corruption

Qmuli prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement):

- ◆ to or from any person or company (wherever they are situated and whether they are a public official or body or private person or company);
- ◆ by any individual employee, agent or other person or body acting on behalf of Qmuli, in order to gain any commercial, contractual or regulatory advantage for Qmuli in a way that is unethical, or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual.

Qmuli further prohibits any individual employee, agent or other person or body acting on behalf of Qmuli to engage in extortion, cronyism, influence peddling, graft, or embezzlement.

Qmuli prohibits any action that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of Qmuli or of the person or body employing them or whom they represent.

The policy is not meant to prohibit normal and appropriate hospitality or the giving of a gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If in any doubt as to whether a potential act constitutes bribery or corrupt practice, the matter should be referred to the director responsible, Marcus Kirby, before proceeding.

### 4. What is bribery?

Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe. All forms of bribery are strictly prohibited. Specifically, you must not:

- ◆ give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

- ◆ give or accept a gift or hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- ◆ accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it we will provide a business advantage for them or anyone else in return;
- ◆ accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
- ◆ offer or accept a gift to or from government officials or representatives, or politicians;
- ◆ threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy; or
- ◆ engage in any other activity that might lead to a breach of this policy.

## 5. Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining image or reputation, or marketing products and services.

Monetary gifts (including redeemable vouchers) must not be offered or accepted. Any gift must not be given in secret.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts that are given must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift its timing and value – eg: Christmas.

Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.

It should be noted that we do not consider buying or receiving a coffee / light lunch to be entertainment / hospitality.

## 6. Individual Responsibilities

The prevention, detection and reporting of bribery or corrupt practices is the responsibility of all Qmuli team members and Qmuli is committed to:

- ◆ encouraging team members to be vigilant and to report any suspicion of such;
- ◆ providing team members with suitable channels of communication and ensuring that sensitive information is treated appropriately;



4 Bloomsbury Square London WC1A 2RP

- ◆ investigating instances of corruption and assisting the police and other appropriate authorities in any resultant prosecution;
- ◆ taking disciplinary action against any individual(s) involved.

Any suspicion of bribery or corruption should be reported in confidence to Marcus Kirby who has overall responsibility for bribery and corrupt practices prevention.

## **7. Managing and Monitoring Compliance within Qmuli**

Qmuli is a small company with only the three owner/directors being sufficiently outward client and supplier facing to have the ability to influence sales and purchases in any real way. This inevitably helps Qmuli to monitor, assess and manage compliance significantly.

Qmuli fosters a culture across its whole team that encourages the identification and reporting of any actions or incidents of bribery or corrupt practice within its business.

Qmuli uses a company called Citation to help ensure Qmuli is updated on necessary requirements and help Qmuli monitor and track its compliance with regard to its staff and regular contractors. Further details are provided in the last section of this document.

In order to ensure compliance across all its business activities, Qmuli has introduced a Whistleblower Policy, a copy of which is available on request.

## **8. Managing and Monitoring Supplier Compliance**

Qmuli has a zero tolerance to bribery or any corrupt practices at any point in its supply chain.

If a supplier has a relevant policy available on their website, this is noted in the Qmuli Supplier Compliance log and no further action is taken. If it is not the case, Qmuli sends the supplier Qmuli's Anti-Corruption and Bribery Supplier Statement.

All new suppliers are flagged by the Head of Finance (Phillipa Lowe) to Marcus Kirby, for such matters, who will then update the log and either check that the supplier publishes an appropriate policy on its website or, if not, send out a copy of Qmuli's Anti-Corruption and Bribery Supplier Statement.

## **9. Training and Compliance Requirements Updates**

Qmuli uses a company called Citation to provide it with the support necessary to ensure that it keeps all its team updated on this policy whenever it changes. This includes topic-specific email updates, useful information in their client portal, and a range of other documentation and fact sheets.



4 Bloomsbury Square London WC1A 2RP

Citation also provides Qmuli with the ability, within their portal, to upload its own policies and other information, such as employee and contractor rules and guidelines, etc. The Citation portal allows Qmuli to distribute this updated policy each time to the team and asks them to confirm that they have read and understood its contents.

## 10. Policy Updates

If Qmuli becomes aware of any requirement to update this policy, it will implement the necessary changes to both policy and all accompanying records. If the change is considered sufficient to warrant it, an updated policy document will be released and made available on its website. Qmuli reviews and updates this policy once every two years as a minimum.

Qmuli maintains a full Anti-Bribery and Corruption Policy that includes:

- ◆ This Policy Document;
- ◆ Qmuli's Anti-Corruption and Bribery Supplier Statement;
- ◆ The supplier log.

## 11. Director Sign Off

This policy is accurate and complete to the best of my knowledge.

A handwritten signature in black ink that reads "Marcus Kirby".

Marcus Kirby  
**Director**

**Date: 9th<sup>th</sup> February 2023.**

Marcus Kirby, the "director responsible", is contactable via email to [marcus.kirby@qmuli.com](mailto:marcus.kirby@qmuli.com)



4 Bloomsbury Square London WC1A 2RP

## **QMULI'S ANTI-BRIBERY & CORRUPTION SUPPLIER STATEMENT**

### **1. PURPOSE OF THIS STATEMENT**

The purpose of this statement is to clearly set out for Qmuli's suppliers its zero-tolerance position on bribery and corruption.

### **2. WHO DOES THIS STATEMENT APPLY TO?**

This statement applies to suppliers that work with, for, or on behalf of Qmuli. Suppliers include companies, consultants, contractors and agency staff. We have a Qmuli Anti-Bribery and Corruption policy that applies to all Qmuli employees.

Failure to comply may result in the termination of contracts with contractors and other third parties working for Qmuli or in disciplinary action being taken against all employees involved.

Qmuli is committed to conducting business in an ethical and honest manner. Qmuli has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

### **3. WHAT IS BRIBERY?**

Bribery is offering, giving, asking for or receiving anything of value with the intent of getting the recipient to do something improper. Examples of something that is of value include, among other things, offers of cash or a cash equivalent, services, offers of employment, charitable donations, political contributions, travel and/or entertainment expenses, meals and gifts.

A bribe can be anything which is given to get someone to do something wrong, or in respect of public officials, to influence them to our business advantage. Bribery is a criminal offence in most countries.

Qmuli expects and requires that you will not bribe anyone. Equally, if someone asks you to pay a bribe, or offers you a bribe, in connection with our business you must refuse and report it immediately.

### **4. WORKING WITH QMULI**

Qmuli may be guilty if a supplier commits an act of bribery on behalf of Qmuli, even if Qmuli was not aware that the associated party had paid the bribe. As you would expect we only work with suppliers who we are confident will not engage in bribery.

Qmuli aims to maintain the highest possible standards of ethical conduct, and we expect our suppliers to do the same. This is achieved by maintaining integrity across our business practices and interactions, encouraging transparency when possible and creating a supplier community based on shared values.





4 Bloomsbury Square London WC1A 2RP

## 5. GIFTS AND ENTERTAINMENT

For the most part, the giving and receiving of gifts and entertainments is a normal way of developing and maintaining business relationships with suppliers. Gift and entertainment should be modest in nature and only ever an infrequent or occasional activity.

Gifts or entertainment that may be construed as bribes or would cause a conflict of interest or damage the reputation of the business are prohibited and must be avoided at all times.

Monetary gifts (including redeemable vouchers) must not be offered or accepted. Any gift must not be given in secret.

## 6. SUPPLIER RESPONSIBILITIES

If you suspect that a breach has occurred or may occur in the future you must notify your Qmuli contact as soon as possible.

We are committed to ensure no one suffers any detrimental treatment because of refusing to take part in bribery or because they have reported in good faith their suspicion that an actual or potential bribery offence has taken place. As long as the reports are made in good faith and the concerns are genuine, no supplier will be at risk of any form of retribution as a consequence of raising a concern.

## 7. WHO TO CONTACT

If you have any questions or would like additional guidance on how this statement applies or should be implemented, please contact your Qmuli contact or email [info@qmuli.com](mailto:info@qmuli.com).