



Construction
& Property
Consultants

SUMMERS-INMAN
ANTI-BRIBERY AND CORRUPTION
POLICY



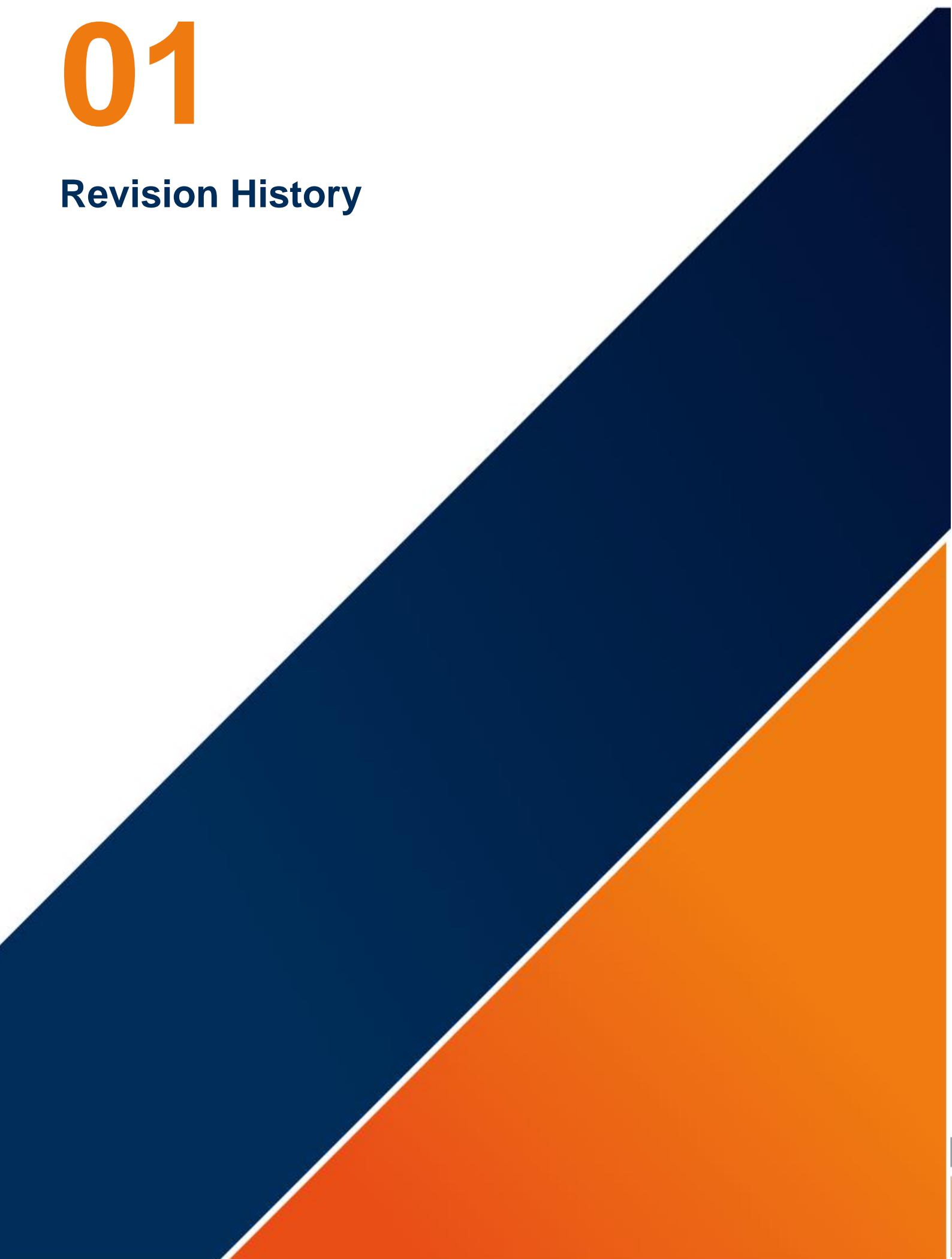
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Revision History



1. Revision History

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Revision	Date	Originator	Description
A	5 th January 2017	David Cronje	Reviewed by new MD
B	7 th January 2019	David Cronje	Reviewed by MD

Review Date

Date	Originator	Description
4 th November 2015	David Cronje	Updated to capture new document format.
5 th January 2018	David Cronje	Updated logos and office addresses
7 th January 2020	David Cronje	Updated to capture new document format
1 st May 2020	David Cronje	Update MD
1 st May 2021	David Cronje	Reviewed by Directors

Next Review date – 29th June 2021

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Anti-Bribery and Corruption Policy

2. Anti-Bribery and Corruption Policy

INTRODUCTION

Summers-Inman strives to attain the highest ethical and professional standards of business practice. All employees and those acting for or on behalf of Summers-Inman are responsible for conducting themselves honestly and professionally.

POLICY

Summers-Inman is committed to a 'zero tolerance' approach to the making or receiving of bribes and other corrupt practices. The Directors prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement, to or from any person or company, public or private, employees (whether permanent, fixed-term or temporary), contractors, consultants, agents as well as organisations or other third parties who act for or on behalf of Summers-Inman.

The Directors are committed to implementing and enforcing effective systems to prevent, monitor and eliminate bribery in accordance with the provisions in the Bribery Act 2010. Bribery is a criminal offence which may result in a prison sentence or unlimited fines for those involved. A breach of Summers-Inman's anti-bribery policy will be treated as ground for disciplinary action and could depending on the nature of the breach result in an employee's dismissal.

WHO DOES THE POLICY APPLY TO?

In this policy, third party means any individual or organisation you come into contact with during the course of your work for us and includes actual and potential clients, customers, suppliers, advisers and government and public bodies including their advisors, representatives and officials, politicians and political parties.

PROCEDURES

Summers-Inman expects its employees, agents, consultants and business partners to act with honesty and integrity and fairness in all aspects of their business activities and exercise as a minimum the standards of professionalism and ethical conduct required by the Royal Institution of Chartered Surveyors of one of its members. This shall be the case whether or not the employee, agent, consultant and business partner is a member of the Royal Institution of Chartered Surveyors and subject to its bye laws and rules.

The prevention, detection and reporting of bribery is the responsibility of everyone at Summers-Inman. Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage to either a Director or to the HR Department. If an employee feels they are a victim of bribery or corruption, it is important to tell a Director or the HR Department as soon as possible. Summers-Inman is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion.

AWARENESS AND COMMUNICATION

Summers-Inman is committed to developing anti-bribery awareness and ensuring that its bribery prevention policies and procedures are embedded and understood throughout the organisation. Summers-Inman will assess the nature and extent of its exposure to potential external and internal risks of bribery. Assessments will be periodic paying attention to dealings with territories which are perceived to have a high level of corruption, to dealings in high risk industry sectors and encouraging employees to be vigilant and to report any suspicion of bribery.

MONITOR AND REVIEW

Summers-Inman will monitor and review procedures. Any improvements identified will be made as soon as reasonably possible.



Signed: _____

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