



Bribery Act Policy

Authorisation

Name	Role	Date
Tahsin Choudhury	Co Founder and CEO	2 nd April 2021

Change History

Release	Date	Author	Description
Version 0.1	March 2021	Tahsin Choudhury	Document Template
Version 1.0	2 nd April 2021	Tahsin Choudhury	Bribery Policy created

Distribution

To	Through
All customers	Website and Email (if requested)

Bribery Act Policy

Definition:

The [UK Bribery Act](#) which was passed in 2010, introduces an offence of corporate failure to prevent bribery. The defence for a company against this liability is to prove that the company had adequate procedures in place to prevent bribery.

Bribery is defined, within the Bribery Act 2010, as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so

Policy Statement:

Ariadne Climate Limited is a company that provides a registry service for the trading of upstream emissions reductions.

Ariadne Climate Limited has a zero tolerance to bribery in any form, including;

- Financial incentives
- Provision or acceptance of gifts
- Facilitation payments to
 - officials in public office or
 - positions of influence within a corporate structure.

This policy applies to all employees of Ariadne Climate Limited. For the purposes of this policy, the term “employee” means all employees of Ariadne Climate Limited staff including permanent, fixed term, and temporary staff, associates, students, secondees, any third party representatives, agency workers, volunteers, interns, agents and sponsors engaged with Ariadne Climate Limited in the UK or overseas. This policy also applies to all members of staff employed by any of Ariadne Climate Limited subsidiary companies.

All contractors and agents acting for or on behalf of Ariadne Climate Limited will be made aware of this policy, particularly during any procurement process. Reasonable due diligence must be carried out to ensure they are not acting in a way contrary to Ariadne Climate Limited policy or procedure.

Third parties acting for Ariadne Climate Limited are expected to take appropriate action should it be suspected or discovered that fraudulent activity or bribery is evident.

Any company employee who is found to be in breach of this policy will be subject to disciplinary procedures. Employees are reminded that fraud and bribery are also criminal offences. The company also reserves the right to seek redress via civil proceedings against individuals whose fraudulent acts or omissions have resulted in financial loss to Ariadne Climate Limited. This is regardless of whether the individual was prosecuted.

This policy has been developed to comply with the provisions of the Bribery Act 2010 and in particular addresses the following:

Principle	Ariadne Climate Response
Proportionate procedures	Use of guidance issued, e.g. by the Ministry of Justice.
Top level commitment	This policy is approved by the Directors
Risk Assessment	The Company will identify potentially high risk activities and implement appropriate measures to mitigate such risks.
Due Diligence	Due diligence will be undertaken. This due diligence will be appropriate to the circumstances and risk involved.
Communication and training	The policy will be disseminated throughout the company. Appropriate training for staff will be implemented.
Monitoring and review	Appropriate monitoring will be undertaken. The policy will be reviewed at regular intervals.

Risk Assessment:

Ariadne Climate Limited is a micro business with a single Director/Employee. Ariadne Climate Limited has a very simple business model based on a fixed fee per UER traded via the platform.

Hospitality:

Ariadne Climate Limited will on occasion invite prospective customers and suppliers, especially when an overnight stay is involved in customer meetings, to a lunch or evening meal.

As a set policy this entertainment will not exceed £50 per person.

As policy any employee or representative of Ariadne Climate Limited is not allowed to accept or provide any gift without notification to the CEO of Ariadne Climate Limited.

Due Diligence:

As part of Ariadne Climate Limited business model **ALL** 3rd party suppliers and contractors will go through a basic due diligence process, gathering information on, but not limited to;

- Financial records (Company House or equivalent)
- Insurance certificates
- Reference calls/site visits of previous customers
- Supplier take on procedures
- Health & Safety processes
- Other policies including;
 - Bribery
 - Corporate Social Responsibility
 - Modern Slavery

Publication of Policy:

This policy, along with all other Ariadne Climate Limited policies is reviewed annually and available on our website (www.ariadneclimate.global)