

Anti-Bribery and Corruption Policy

ParcelPlanet is committed to conducting all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery and corruption, adhering to Irish legislation in this regard, particularly The Criminal Justice Act 2018, in respect of our business dealings both at home and abroad. This policy establishes controls to ensure the highest ethical standards and compliance with applicable regulations.

Scope of the policy

ParcelPlanet is deemed liable for the actions of our directors, managers, secretaries, officers, shadow directors, employees, agents or subsidiaries who commit a corruption offence with the intention of obtaining/retaining business, or a business advantage, for ParcelPlanet. As an employer, if we fail to prevent corruption, we are liable to a fine, imprisonment and damage to our reputation. We therefore take our legal responsibilities very seriously. Any employee who breaches this policy will face disciplinary action, up to and including dismissal. We also reserve the right to terminate our contractual relationship with other workers if they breach this policy.

Corruption Offences

ParcelPlanet strictly prohibits the use or facilitation of all Corruption Offences listed below. All employees must avoid any activity that might lead to, or suggest, that a Corruption Offence will be made or accepted by us.

The term “corruptly” is defined broadly as “...acting with an improper purpose personally or by influencing another person....” (a) by means of making a false or misleading statement, (b) by means of withholding, concealing, altering or destroying a document or other information, or (c) by other means. Corruption offences are defined as –

Active and Passive Corruption

This is defined as either directly or indirectly corruptly offering/giving, or corruptly requesting/accepting, a gift, consideration or advantage as an inducement to, or reward for, any person doing an act in relation to his or her office of employment, position or business.

Active and passive trading in influence

This is defined as either offering/giving or requesting, accepting or obtaining a gift, consideration or advantage to induce a third party to exert an improper influence over an official in relation to their position.

Corruption in Office, employment, position or business

This creates an offence for a person, who does any act in relation to their position, for the purpose of corruptly obtaining a gift, consideration or advantage for himself or for any other person. It also creates an offence for a person who uses confidential information for the same purpose.

Giving (and receiving) of Gifts to facilitate an offence

This is defined as giving a gift, consideration or advantage to a person knowing that this will be used to facilitate an offence.

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality that are given/received in good faith and not offered, promised or accepted to secure an improper advantage for ParcelPlanet or any of its employees or associated persons. A written record of these gifts must be declared and then maintained by ParcelPlanet in a register.

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However, in certain circumstances gifts and hospitality may amount to corruption. ParcelPlanet will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.

If it is not appropriate to decline a gift of significant value, it may be accepted, provided it is then declared to the employee's manager, it may then be donated to charity. The intention behind the gift should always be considered.

Creating or using a false document

This is defined as a person corruptly creating or using a document knowing / believing it to contain a false / misleading statement with the intention of inducing that person to do an act in relation to their office, employment, position or business, to the prejudice of that person.

Intimidation

This is defined as directly or indirectly threatening to harm another person with the intention of corruptly influencing that person, or another person, to do an act in relation to the person's office employment, position or business. It sets out a broad definition of harm to include loss, disadvantage or injury of any kind.

Penalties

A person guilty of an offence under the Act will be liable, on summary conviction, to a fine, imprisonment for a term not exceeding twelve months and forfeiture of the gift, consideration or advantage accepted or obtained in connection with the offence. On indictment, this is subject to a fine or imprisonment for a term not exceeding five years.

Record Keeping

ParcelPlanet will keep financial records and have appropriate controls in place. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts should be prepared and maintained with strict accuracy and completeness.

As referenced above, you must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to management review. All expense claims relating to hospitality or gifts, or expenses incurred to third parties, must be submitted in accordance with our expense policy.

Raising a Concern

Employees and associated persons are encouraged to report any concerns that they may have to their line manager, or if this is not appropriate, to an alternative senior manager, as soon as possible. Any person who has reported an instance or concern of corruption in good faith will be supported by ParcelPlanet. ParcelPlanet will ensure that the individual is not subjected to detrimental treatment as a result of raising a corruption concern.

Monitoring and Training

ParcelPlanet will regularly review the effectiveness of this policy. Training sessions will be arranged for appropriate individuals where necessary to ensure staff know how to recognise, and deal with, suspected bribery and corruption. ParcelPlanet will take all reasonable steps and exercise all due diligence to avoid the commission of an offence. ParcelPlanet reserves the right to amend and update this policy as required.