

Anti-Corruption and Anti-Bribery Policy

1. Policy Statement

Diamond conducts its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption in all its forms and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

2. Who does this policy apply to and how does it apply?

This policy applies to all persons working for Diamond or on our behalf in any capacity, including Diamond Employees, joint appointees, seconded workers, collaborators, students, volunteers, interns, agents, contractors (specifically including suppliers and casual and agency staff), external consultants and third-party representatives (“you”).

This policy will be kept under review and may be revised by Diamond from time to time as considered appropriate. It will be the most recently published version of this policy that will apply if any issue arises which needs to be addressed under it.

This policy does not form part of any Diamond Employee’s contract of employment.

3. Who is responsible for this policy?

Diamond’s Directors have overall responsibility for this policy. The General Counsel has delegated day-to-day responsibility for its operation. Any queries or suggestions relating to this policy should be sent to legal@diamond.ac.uk.

4. Bribery

A Bribe and all forms of Bribery are strictly prohibited. If you are unsure about whether a particular act constitutes Bribery, you should raise it with your Diamond Primary Contact, your line manager or contact Diamond’s HR team.

Specifically, you must not:

- (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business or academic advantage will be received in return, or to reward any business received;
- (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business or academic advantage for them or anyone else;
- (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- (d) threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

5. Corporate Hospitality and Gifts

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

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, during a tender process or in anticipation of accessing facilities).

Corporate Hospitality and Gifts are addressed in Diamond's [Corporate Hospitality and Gifts Policy](#), and can be reported using the [Gifts and Hospitality received form](#) (This policy and the associated form are currently only available on Diamond's intranet. If you need any assistance please contact policies@diamond.ac.uk).

6. Record-Keeping

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

A record of gifts and corporate hospitality must be kept in accordance with Diamond's [Corporate Hospitality and Gifts Policy](#) (This policy is only available on Diamond's intranet. If you need any assistance please contact policies@diamond.ac.uk).

7. Compliance with related policies and codes of conduct

This policy should be read in conjunction with Diamond's [Anti-Slavery and Human Trafficking Policy](#), [Conflict of Interest Guidelines](#), [Corporate Gifts and Hospitality Policy](#), [Due Diligence Policy](#), [Fraud Policy](#), [Gifts and Prizes Policy](#), [Whistleblowing Policy](#) and Diamond's [Supplier Code of Conduct](#) (Please note that some of these related Policies are only available on Diamond's intranet. If you need any assistance please contact policies@diamond.ac.uk).

8. How to raise a concern

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your line manager or primary Diamond contact or report it in accordance with our [Whistleblowing Policy](#) as soon as possible. (Please note that this policy is available on Diamonds intranet site. If you have any questions please contact policies@diamond.ac.uk).

9. Breach of this Policy

Breach of this policy may:

- (a) In the case of Diamond Employees, result in disciplinary action up to and including dismissal.
- (b) In the case of organisations or individuals who are not Diamond employees, result in termination of any contract that you may have in place with Diamond and/or termination of access to Diamond.

10. Amendments to this Policy

This policy will be kept under review and may be revised by Diamond from time-to-time as considered appropriate. It will be the most recently published version of this policy that will apply if any issue arises which needs to be addressed under it.

Definitions

For the purposes of this policy, the following definitions shall apply:

Bribe: *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: *The offering, promising, giving, accepting or seeking a Bribe.*

Diamond: *Diamond Light Source Ltd, a company incorporated and registered in England and Wales, with company number 4375679 and with registered office at Diamond House, Harwell Science & Innovation Campus, Didcot, Oxfordshire, OX11 0DE, United Kingdom.*

Diamond Employee: *Any person working for Diamond under a contract of employment and any Diamond director or office holder.*

Diamond Primary Contact: *The person at Diamond who is responsible for the management of any relevant contract.*

You: All persons working for Diamond or on our behalf in any capacity, including Diamond Employees, directors, officers, joint appointees, seconded workers, collaborators, students, volunteers, interns, agents, contractors (specifically including suppliers and casual and agency staff), external consultants and third-party representatives.