Anti-Bribery and Corruption Policy

Design Magic Limited
Company Registration: 05866636

Last Updated: 17th February 2026
Next Update Due: 17th February 2027

1. Purpose of this Policy

Design Magic Limited ("the Company") is committed to upholding the highest standards of ethical conduct and integrity. This Anti-Bribery and Corruption Policy outlines our zero-tolerance approach to bribery, corruption, and unethical business practices.
The purpose of this policy is to:

- Ensure compliance with the **Bribery Act 2010** and relevant UK legislation.
- Protect the Company, employees, clients, suppliers, and other stakeholders.
- Establish clear standards of behaviour.

2. Scope

This policy applies to:

- All employees, directors, and officers of Design Magic Limited.
- Contractors, consultants, freelancers, agency staff, and temporary workers.
- Third-party representatives acting on behalf of the Company (e.g., resellers, IT partners, suppliers).

Every individual covered under this policy must ensure compliance at all times.

3. Definitions

3.1 Bribery

Offering, giving, soliciting, or receiving any financial or non-financial advantage to improperly influence a decision, secure a business advantage, or induce unlawful behaviour.

3.2 Corruption

Abuse of entrusted power for personal, professional, or commercial gain.

3.3 Facilitation Payments

Small "unofficial" payments made to expedite routine actions. These are **strictly prohibited**.

3.4 Gifts and Hospitality

Items or entertainment offered as part of business relationships. These must be transparent, reasonable, and never intended to influence decision-making improperly.

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4. Policy Statement

Design Magic Limited **prohibits bribery and corruption in all forms**. Employees and third parties acting on behalf of the Company must **never**:

- Offer, promise, give, request, or accept bribes.
- Make facilitation payments.
- Offer or accept gifts/hospitality that could improperly influence business decisions.
- Engage in unethical procurement or tendering practices.
- Make political donations on behalf of the Company.
- Conceal or misrepresent any transaction that could breach this policy.

Failure to comply may result in disciplinary action, including dismissal, termination of contract, and referral to law enforcement authorities.

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5. Gifts and Hospitality

Reasonable and proportionate hospitality is permitted **only** when:

- It is for legitimate business purposes.
- It is not intended to secure an improper advantage.
- It complies with this policy and is recorded appropriately.

Prohibited:

- Cash or cash equivalents (e.g., gift cards).
- Lavish or excessive gifts or events.
- Hospitality offered during contract tenders.
- Anything that could be seen as influencing a decision.

All gifts and hospitality must be declared to the Company Director.

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6. Third-Party Relationships

Design Magic Limited may be liable for the actions of third parties acting on its behalf. Therefore:

- Due diligence must be conducted before engaging partners, suppliers, or subcontractors.
- Contracts must include anti-bribery and compliance clauses.
- Any suspected unethical practices must be reported immediately.

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7. Record Keeping

The Company will maintain accurate records of:

- Payments made and received.
- Gifts and hospitality.
- Due-diligence checks on third parties.
- Conflicts of interest declarations.

No off-record, secret, or unapproved accounts are permitted.

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8. Reporting Concerns

Employees and associated persons must report concerns immediately.
You can report to:

- **Mike Hodgson**, Solutions Director
- Email: **mike@designmagic.net**
- Phone: **0203 876 1111**

Reports will be kept confidential, and no retaliation will occur toward anyone raising a concern in good faith.

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9. Training and Awareness

- All employees will receive training on anti-bribery and corruption upon induction and periodically thereafter.
- Managers are responsible for ensuring team understanding and compliance.

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10. Responsibilities

The Board / Directors

- Ensure effective implementation of this policy.
- Monitor risks and compliance.

All Employees

- Read, understand, and follow this policy.
- Report suspicious activity immediately.

Third Parties

- Abide by the same ethical standards as Design Magic Limited.

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11. Consequences of Non-Compliance

Breaches may result in:

- Disciplinary action, including dismissal.
- Contract termination for third parties.
- Criminal prosecution under the Bribery Act 2010 (penalties may include fines or imprisonment).

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12. Review of Policy

This policy will be reviewed annually or following relevant changes in legislation, business operations, or identified risks.

Approval

Approved by: Mike Hodgson, Solutions Director
Date: 17/2/2026

Please contact Design Magic with any questions on 0203 876 1111