

Section 7 of the Bribery Act 2010 makes it clear that commercial organisations are vicariously liable for acts undertaken by their representatives where these acts involve the acceptance of a bribe in order to obtain/retain business or an advantage for the commercial organisation.

As a business, The Editorial Hub has assessed its risk of bribery and corruption as relatively low. Even so, we understand that the risk of bribery and corruption is inherent with running a business such as ours.

1. We operate on a global scale in that we support publishers, societies and journals based across all continents. We pride ourselves on our reputation for acting fairly and ethically wherever we do business. We take seriously our obligations under modern slavery legislation, and in relation to equality and diversity. We are careful to ensure that our working practices are pertinent to our business and fulfil our ethical desires as well as our compliance obligations.

2. **As a business, we do not tolerate bribery or corruption in our business or in those we do business with.** Bribery and corruption is not a victimless crime:

"Corruption ... undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish. This evil phenomenon is found in all countries - big and small, rich and poor ... corruption hurts the poor disproportionately by diverting funds intended for development, undermining a government's ability to provide basic services, feeding inequality and injustice and discouraging foreign aid and investment. Corruption is a key element in economic under-performance and a major obstacle to poverty alleviation and development."

(Kofi Annan, former UN Secretary General)

3. Our anti-bribery and corruption procedures are proportionate, committed to at the highest level within our business and communicated to our staff, freelancers, contractors and suppliers ("representatives"). Our policy is based on the following:

a. **Responsibility.** We remind our staff, freelancers, contractors and suppliers that they are responsible for their actions, and that if they break the law, they will have to face the consequences - which could mean a fine, imprisonment, or both.

b. **Integrity.** We urge our staff, freelancers, contractors and suppliers not to compromise their integrity. If they think something is wrong, they are encouraged to always report it. If they are not sure, we encourage them to seek our guidance and support. It is important

to us that our representatives feel enabled to identify and report incidents of bribery or corruption.

- c. **Genuineness.** We encourage our representatives to pay genuine prices for genuine goods and services, and never pay over the odds. We appreciate that agents who ask for especially large fees or commissions may do so in order to pay bribes on our behalf and that where this occurs we will be responsible.
 - d. **Honesty.** We require our representatives to always act honestly and in good faith at all times and in all aspects of their work on our behalf.
 - e. **Transparency.** As a business, we keep accurate records (including all invoices and receipts) of everything that we do, especially in relation to the payments we make and what they are for. We accept that full and accurate records demonstrate complete transparency.
4. Our due diligence processes conducted upon procurement require us to make enquiries of potential suppliers as to their position on bribery and corruption and how they seek to prevent it. We also make enquiries about potential conflicts of interest, jurisdiction, sector, and the involvement of public officials in order to conduct a risk assessment which has regard to issues such as malpractice, bribery and corruption as well as modern slavery and human trafficking.
5. We have internal processes and policies designed to identify and avoid attempts at bribery and corruption, and we encourage our staff, freelancers, consultants and suppliers to be transparent with their interactions with third parties. We discourage our staff, freelancers, contractors and suppliers from accepting or giving gifts or hospitality; as gifts and entertainment could sometimes disguise bribes, or be misinterpreted as bribes. However, we accept that they may arise nevertheless in which case we have rules which clearly define what we consider to be genuine and acceptable and what is not. This applies to gifts received and made.
6. We ensure that money paid to a charity is not contingent upon the award of business. We differentiate instances of sponsorship by the entering into an appropriate agreement which regulates the relationship. We will only offer sponsorship where it brings measurable benefits to the business so there can be no ambiguity as to its true intention.
7. The Editorial Hub understands that facilitation payments are bribery and are illegal in nearly all countries. Even in countries where they are not illegal, we will not pay (or allow to be paid on our behalf) facilitation payments under any circumstances.
8. Payments made for the support of a political party or cause will only be made upon a written resolution of the Board. Such payments will never be paid in circumstances where The Editorial Hub is also in negotiation for a public authority or government contract/licence.