Anti-Bribery & Corruption Policy

1. Purpose and Scope
This policy sets out our commitment to conducting business in an honest, transparent, and ethical way, in full compliance with the Bribery Act 2010. We take a zero-tolerance approach to bribery and corruption in all its forms and expect the same from employees, contractors, suppliers, and anyone acting on our behalf.

2. What is Bribery?
Bribery is the offer, promise, giving, request, or acceptance of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust. Examples include: offering cash or gifts to secure work, providing lavish hospitality to influence a decision, or accepting payment to ignore legal obligations.

3. Policy Statement
We will not engage in bribery or corruption under any circumstances. We prohibit facilitation payments, maintain accurate financial records, and uphold all laws relevant to countering bribery and corruption.

4. Gifts & Hospitality
Modest gifts and hospitality may be part of business practice, but they must not improperly influence decisions. Cash gifts are prohibited. All gifts/hospitality must be reasonable, declared, and transparently recorded.

5. Conflicts of Interest
Employees must avoid conflicts where personal interests could conflict with business interests. Any outside business activity must be declared. Potential conflicts must be reported immediately.

6. Charitable Donations & Sponsorships
Donations and sponsorships must be transparent and never used to secure advantage. All must be approved by senior management.

7. Responsibilities
Directors ensure systems are in place. Employees must comply with this policy. Suppliers are expected to adopt equivalent standards.

8. Reporting Concerns
Employees and third parties are encouraged to report suspicions of bribery in confidence. All reports will be investigated. Retaliation will not be tolerated.

9. Training & Communication
All employees will receive training. This policy will be communicated to suppliers and updated as needed.

10. Record Keeping
We maintain detailed records of all gifts, hospitality, donations, and sponsorships. Financial records must be accurate; no 'off-book' accounts are allowed.

11. Breach of Policy
Breaches will be treated as disciplinary matters. Contracts may be terminated and authorities informed if necessary.

12. Review
This policy will be reviewed annually by senior management to ensure effectiveness and compliance.