

Business Management System

Section 1: Administration

Part 15 – Anti-Bribery Policy

Document Record		
Rev	Changes	Date
1	Original	3 rd January 2025
2	Annual Review	5 th January 2026

The Bribery Act 2010

This policy statement provides a framework within which staff must operate to avoid committing an offence under the Bribery Act 2010 (the “Act”).

The Act creates the following offences relevant to this company:

- Paying bribes – it is an offence to offer, promise or give a bribe (so-called “active bribery”)
- Receiving bribes – it is an offence to request, agree to receive or accept a bribe (so-called “passive bribery”)

A person who is convicted of an offence of paying a bribe or receiving a bribe is liable on conviction to a maximum penalty of 10 years imprisonment and a fine or both.

A corporate offence is where a commercial organisation or associated person fails to prevent persons performing services on its behalf from committing bribery. This company would be guilty of this offence if the person who performs a service on behalf of the organisation bribes another person intending:-

- (a) to obtain or retain business for This company; or
- (b) to obtain or retain an advantage in the conduct of business for this company

If an organisation is found guilty of corporate bribery, both the organisation and its managers and/or directors could be subject to criminal sanctions. An “associated person” acting on behalf of the company could potentially include Directors, staff, agents and sub-contractors.

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act dishonestly. Bribes can take on different shapes and forms and often both parties will benefit. A bribe can involve a direct or indirect promise or offer of something of value, the offer or receipt of a loan, fee or reward or other advantage and/or giving of aid, donations or voting with the intention of exerting improper influence.

Policy Statement

It is our policy to conduct its business in an open, honest and transparent way and without the use of corrupt practices or acts of bribery to obtain an unfair advantage. This company is committed to adherence to the highest legal and ethical standards and this must be reflected in every aspect of the way in which we operate.

All staff will receive training which will enable them to be effective in the discharge of their responsibilities. The company does not preclude the acceptance of hospitality, gifts or entertainment so long as they are reasonable. Limits are prescribed in the policy.

The acceptance or commission of a bribe is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals, invitations to events and functions in connection with matters relating to this company’s business. These activities are acceptable provided they fall within reasonable bounds of occurrence and value. Routine inexpensive and very occasional gifts, entertainment and hospitality are acceptable whereas lavish or extraordinary gifts, entertainment and hospitality are not.

Before accepting or giving a gift, staff must always be aware as to the intent.

- Is it to build a relationship or is it something else?
- How would this look to the “reasonable man in the street”?

If you find it difficult to answer these questions there may be a risk involved and the risk could be unlawful. If you are in any doubt, in the first instance contact your line manager immediately.

Gifts, entertainment and hospitality that are never acceptable include where something is offered for something in return. Gifts of cash or cash convertible items are expressly prohibited.

Awarding a Contract for Goods or Services (Procurement)

Staff dealing with or using other parties must be aware of the possibility of being influenced to engage in or facilitate bribery. Staff could, for instance, receive excessive hospitality or gifts in order that they, on the company's behalf, give business to the other party. Staff must not accept any gift, hospitality or entertainment which is, or could be, construed as being designed to influence you in the performance of your job and / or to influence you to act dishonestly.

Modest entertainment or invitations to events as part of pre-contract negotiations are likely to be acceptable but in every event your line manager must be informed.

Donations

We do not make contributions to political organisations. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Director.

Limits

Limits apply depending on the value (estimated or known) of the gift:

- Less than £25 – no action necessary other than informing your line manager
- More than £25 and less than £250 – this must be declared in writing to the Operations Director
- More than £250 – the gift must not be accepted and the Director informed. However, in exceptional circumstances, the Director may take a view on the suitability of the gift and at his sole discretion, agree that the gift can be accepted.

Acceptance of a gift within these limits which has not been declared as required is considered to be an act of gross misconduct and renders that member of staff liable to disciplinary action if found guilty.

Media and Complaints

Any member of staff who is contacted by the media or is the subject of any complaint in respect of bribery allegations should report that immediately to the Director so that a response can be prepared.

Integrity of Staff

This company recognises that a good standard of staff recruitment and vetting is important in order to reduce the risk of employing staff who are easily persuaded and / or willing to engage in corrupt practices, including bribery and fraud.

Training

Staff will receive regular training / briefings on the Act.

How to raise a Concern

All staff have a responsibility to help detect, prevent and report instances not only of bribery but also of any other suspicious activity or wrongdoing. This company is committed to ensuring that all staff have a safe, reliable and confidential way of reporting any suspicious activity. If any staff member has a concern regarding a suspected instance of bribery or corruption they must notify the Director.

Investigation of suspected fraud, corruption or bribery

The Director will determine who will carry out the investigation of suspected fraud, corruption or bribery, but may appoint agents to conduct the investigation where circumstances require this. The company reserve the right to involve the Police in the investigation and the decision to do this will be made based on the potential scale and sophistication of the suspected fraud, corruption or bribery. In determining the scope of the investigation of suspected fraud, corruption or bribery, the company will evaluate the risk of a wider problem and will consider such matters as:

- other opportunities for fraud, corruption or bribery by any suspected employees;
- the possibility of similar frauds having happened in other areas sites;
- the possibility of collusion between employees and third parties.

The company, its employees and agents will make available to the investigator all such information and records as are necessary to pursue the investigation. All matters investigated will be kept confidential in so far as this does not hinder or frustrate the investigation process. The investigator will prepare a report setting out their findings from the investigation. The report will cover:

- an opinion on whether fraud, corruption or bribery has been committed and the reasons and summary evidence in support of the opinion;
- where the opinion is that fraud, corruption or bribery has been committed, a description of the fraud, corruption or bribery, value of loss, people involved and the means by which the fraud, corruption or bribery was perpetrated;
- measures already taken or to be taken to prevent recurrence;
- any recommendations for action to strengthen future responses to fraud, corruption or bribery.

In forming this report there is a requirement to interview witnesses. Any interviews of employees should take place under the guidance of the Director as subsequent or concurrent disciplinary action may be taken against any employees found guilty of dishonesty.

Any findings that fraud, corruption or bribery has been committed and conclusions about the persons responsible will be subject to the decisions of the company on the report, to any subsequent investigations and decisions under company disciplinary procedures and to legal proceedings.

The company that the matter is reported to the police if this has not happened at an earlier stage and/or that civil action is taken to recover losses.

A risk assessment has been undertaken in the HSQE Board meeting and it has been determined that the risk of an occurrence is deemed as very low. This assessment will be reviewed annually.



James Delahunt
Managing Director

5th January 2026

BRIBERY RISK ASSESSMENT FORM

Consider each question, then rate the degree of risk and insert the score in the right-hand column. Add each score to determine the Company's potential risk / exposure to bribery

**Score 1 = Low Risk, 2 = Some Risk, 3 = Medium Risk,
4 = High Risk, 5 = Very High Risk**

Score

1. Country Risk

1.1	Does the organisation operate mostly in the UK? If yes, give low score.	1
1.2	Does the organisation operate mostly in the UK, Europe, and US? If yes, give low score.	1
1.3	Does the country in which the organisation operates or will operate have perceived high levels of corruption? If yes, score high. Refer to Transparency International website for objective and detailed assessments.	1
1.4	Has the organisation recently acquired or merged with any organisations in countries with perceived high levels of corruption? If yes, score high. Refer to Transparency International website for objective and detailed assessments.	1
1.5	Does the country in which activity is taking place or is proposed have effectively implemented anti-bribery legislation? If yes, give low score.	1
1.6	Does the country in which activity is taking place or is proposed have effective procurement and investment policies by the local government and agencies? If yes, give low score.	1

2. Sector Risk

2.1	Is the proposed activity within an industry sector at risk of bribery practices? For example:	
	• large-scale infrastructure such as transport or public projects;	
	• oil/gas/mining industries; or	
	• construction/property development.	1
	If yes, give high score.	

3. Transaction Risk

3.1	Does the transaction involve charitable donations? If yes, give high score.	1
3.2	Does the transaction involve political donations? If yes, give high score.	1
3.3	Does the transaction involve licences, permits and transactions relating to public procurement which brings employees and others into frequent contact with public officials? If yes, give high score.	1

4. Opportunity Risk

4.1	Does the project involve a number of contractors and intermediaries? If yes, give high score.	1
4.2	Does the project involve below-market prices? If yes, give high score.	1
4.3	Does the project involve a tendering exercise? If yes, give high score.	1

5. Partnership Risk

5.1	Will the proposed activity involve the potential use of intermediaries in transactions with foreign public officials? If yes, give high score.	1
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5.2	Is there a risk of relationships with politically sensitive persons where the proposed relationship involves or is linked to prominent public officials? If yes, give high score.	1
6. Perceived Pressure at Work		
6.1	How many employees does the organisation employ? Score -	
	• 1 point for one to five employees	
	• 2 points for six to 30 employees	
	• 3 points for 31 to 99 employees	3
	• 4 points for 100 to 499 employees	
	• 5 points for 500 or more employees	
6.2	What is the organisation's turnover? Score -	
	• 1 point for up to £100,000	
	• 2 points for up to £250,000	
	• 3 points for up to £500,000	
	• 4 points for up to £1m	
	• 5 points for more than £1m	
6.3	Is there a robust and clear anti-bribery policy in place within the organisation? If no, score high.	1
6.4	Has the organisation's anti-bribery policy been communicated at all levels? If no, score high.	1
6.5	Is there a board member or senior manager appointed to take responsibility for all anti-bribery measures within the organisation? If no, score high.	1
6.6	Are there robust internal financial controls in place to monitor all payments and transactions? If no, score high.	1
6.7	Are there clear policies in place in relation to hospitality, entertainment, promotional expenditure and expenses? If no, score high.	1
Total score (out of a possible 110)		
Scoring Assessment:		
A score of 67 to 110 indicates a high risk of bribery. Immediate steps need to be taken to counter the high risk and probability of bribery occurring. In certain cases, it may be necessary to stop certain operations or transactions occurring. The organisation will need to take urgent action in relation to specific high-risk areas identified above.		
A score of 45 to 66 indicates a medium risk of bribery. A full anti-bribery policy needs to be in place and training rolled out at all levels. Such training should be given to employees and associated persons, including agents, consultants and temporary workers working on behalf of the organisation in the UK and overseas. Leadership is required from the Board to ensure full engagement and compliance. The organisation should ensure that clear reporting mechanisms are in place so that suspected bribery may be immediately dealt with. Specific high-risk areas identified above should be dealt with at the highest levels, preferably by board members as an urgent priority.		
A score of 22 to 44 indicates a low risk of bribery. Where there is a low risk on the basis of the risk factors identified above, steps will be taken to ensure that there are adequate procedures in place to counter bribery. This may include a written policy that is available to all employees and associated persons working on behalf of the organisation and regular audits of key financial processes, including expenses and hospitality. The organisation should keep its risk assessment under review and take appropriate steps should a bribery risk emerge.		