

# Anti-Bribery and Corruption Policy

## Purpose

This Anti-Bribery and Corruption Policy sets out [Your Company Name]'s commitment to conducting business ethically, honestly, and in compliance with all applicable anti-bribery and corruption laws, including the UK Bribery Act 2010. We maintain a zero-tolerance approach to bribery and corruption in all forms.

## Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, and any third parties acting on behalf of [Your Company Name].

## What is Bribery?

Bribery involves offering, giving, requesting, or accepting any financial or other advantage to induce or reward improper performance of a function or activity.

## Prohibited Conduct

You must not:

- Offer, promise, give, or authorise a bribe
- Request, agree to receive, or accept a bribe
- Make facilitation payments (small payments to expedite routine actions)
- Offer or accept anything of value to improperly influence a business decision

## Gifts and Hospitality

Gifts and hospitality must:

- Be reasonable, proportionate, and for legitimate business purposes
- Not be intended to influence a decision improperly
- Comply with any internal approval procedures

Cash or cash equivalents must never be given or accepted.

## Third Parties

We take steps to ensure that third parties acting on our behalf:

- Are subject to appropriate due diligence
- Understand and comply with this policy
- Operate with integrity and transparency

## Record Keeping

All financial transactions must be recorded accurately and transparently. False, misleading, or incomplete records are strictly prohibited.

## Responsibilities

All individuals covered by this policy are responsible for:

- Reading, understanding, and complying with this policy
- Avoiding any activity that could lead to a breach
- Reporting concerns promptly

Managers are responsible for ensuring compliance within their teams.

## Reporting Concerns

Any suspected bribery or corruption must be reported immediately through:

- Line management
- HR department
- [Whistleblowing Contact / Email]

Reports will be treated confidentially, and no retaliation will be taken against individuals who raise concerns in good faith.

## Breaches of This Policy

Breaches may result in disciplinary action, including dismissal, and may also lead to criminal prosecution. We may terminate relationships with third parties who breach this policy.

## Training and Communication

We provide appropriate training to ensure awareness and understanding of anti-bribery and corruption risks and obligations.

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## Monitoring and Review

This policy will be regularly reviewed and updated to ensure effectiveness and compliance with legal requirements.

## Approval

This policy has been approved by senior management.

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Approved by: Steve Whiteley

Managing Director

Complete M&E Services (CMES) LTD

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