



Anti-Bribery & Corruption Policy

Reference:	CHA-HR-POL-0012	Issue No.:	2026-1	Date of Issue	27/07/2026
Originated By:	Tara Pullen	Authorised By:	Claire Owens	Page 1 of 5	

ANTI-BRIBERY & CORRUPTION POLICY

1. **PURPOSE & STATEMENT OF COMMITMENT**

The Company is committed to conducting its business ethically, transparently and in compliance with all applicable laws. We take a zero-tolerance approach to bribery and corruption and are committed to preventing bribery by anyone acting for, or on behalf of, the Company.

This policy is designed to ensure compliance with the Bribery Act 2010 and applies to all employees, workers, contractors, agency staff, directors, consultants, and any third parties associated with the Company.

2. **SCOPE**

This policy applies to:

- All business activities in the UK and overseas
- All employees regardless of role or seniority
- All third parties acting on behalf of the Company, including agents, subcontractors, suppliers and intermediaries

3. **DEFINITIONS**

Corruption

Corruption is defined as the abuse of entrusted power for private gain.

Examples include:

- Abuse of authority or position
- Acting beyond the remit of one's role
- Obtaining benefits for personal gain rather than for the Company

Bribery

Bribery is a specific form of corruption and is defined as offering, promising, giving, requesting or accepting an advantage to induce or reward improper performance of a function or activity.

This includes:

- Cash payments or equivalents
- Gifts, hospitality or entertainment
- Donations, sponsorships or internships
- Discounts, rebates or preferential treatment
- Facilitation payments (always prohibited)

Bribery can occur directly or indirectly, including through a third party.

4. **OFFENCES UNDER THE BRIBERY ACT 2010**

The Bribery Act 2010 creates four key offences:

1. Bribing another person
2. Being bribed
3. Bribing a foreign public official
4. Failure of a commercial organisation to prevent bribery

The Company may be liable even where bribery is committed by an associated person unless it can demonstrate adequate procedures to prevent bribery.

Reference:	CHA-HR-POL-0012	Issue No.:	2026-1	Date of Issue	27/07/2026
Originated By:	Tara Pullen	Authorised By:	Claire Owens	Page 2 of 5	

ANTI-BRIBERY & CORRUPTION POLICY

5. WHO CAN BE PROSECUTED AND PENALTIES

- Individuals may face up to 10 years' imprisonment and/or an unlimited fine
- Companies may face an unlimited fine, exclusion from contracts, and reputational damage

Knowledge of bribery, or turning a blind eye, may result in liability.

6. PROHIBITED CONDUCT

It is strictly prohibited for any employee or person working on behalf of the Company to:

- Offer, give, request or accept any bribe
- Accept any advantage intended to induce improper performance
- Make facilitation payments (regardless of local custom)
- Offer or accept hospitality that is excessive, inappropriate or disproportionate
- Use a third party to circumvent this policy

7. GIFTS, HOSPITALITY AND BUSINESS COURTESIES

The Company recognises that proportionate and reasonable hospitality may be appropriate in certain business contexts.

However:

- Low-value, infrequent hospitality may be exempt from prior approval where it falls within published thresholds.
- All gifts and hospitality must be:
 - Reasonable and proportionate
 - Infrequent
 - Transparent
 - Properly recorded

A register of gifts and hospitality will be maintained. Exceptions must be approved retrospectively within a specified timeframe.

Hospitality becomes bribery where it could reasonably be perceived as intended to influence a business decision.

8. RESPONSIBILITIES

The Board and Senior Management

The Board is responsible for:

- Setting a clear tone of zero tolerance
- Ensuring adequate procedures are in place
- Monitoring compliance and enforcement

Employees and Associated Persons

All individuals covered by this policy must:

- Comply fully with this policy

Reference:	CHA-HR-POL-0012	Issue No.:	2026-1	Date of Issue	27/07/2026
Originated By:	Tara Pullen	Authorised By:	Claire Owens	Page 3 of 5	

ANTI-BRIBERY & CORRUPTION POLICY

- Avoid any activity that could give rise to bribery
- Declare and seek approval for any offered or proposed benefit
- Raise concerns promptly

Failure to comply may result in disciplinary action, up to and including dismissal. Appropriate due diligence will be carried out on third parties acting on behalf of the Company, including agents, intermediaries and subcontractors, proportionate to the level of risk.

9. REPORTING CONCERNS (WHISTLEBLOWING)

Any suspected bribery or corruption must be reported immediately to:

- The Managing Director, or
- A member of the Board, or
- In accordance with the Company's Whistleblowing Policy

Employees will not suffer any detriment for raising genuine concerns, even if they later prove to be unfounded, provided they had a reasonable belief.

10. INVESTIGATIONS AND ENFORCEMENT

All allegations will be:

- Taken seriously
- Investigated promptly and confidentially
- Addressed in line with disciplinary procedures

Confirmed breaches may result in:

- Disciplinary action, up to and including dismissal for gross misconduct
- Termination of contracts with third parties
- Referral to law enforcement where appropriate

11. ADEQUATE PROCEDURES

The Company maintains adequate procedures to prevent bribery, including:

- Risk assessment (assessing bribery and corruption risks arising from its activities, sectors, jurisdictions, and relationships with third parties)
- Board-level commitment
- Clear reporting channels
- Training and communication
- Monitoring and review

Employees must notify the Board of:

- Any personal benefit offered or requested
- Any business benefit that appears improper

Reference:	CHA-HR-POL-0012	Issue No.:	2026-1	Date of Issue	27/07/2026
Originated By:	Tara Pullen	Authorised By:	Claire Owens	Page 4 of 5	

ANTI-BRIBERY & CORRUPTION POLICY

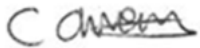
These procedures are proportionate to the Company's size, structure and risk profile and are designed to prevent, detect and respond to bribery risks.

12. AUDIT, MONITORING AND REVIEW

This policy forms part of the Company's internal audit and compliance framework and will be:

- Reviewed annually
- Updated following legislative, regulatory or business changes
- Communicated to all relevant parties

The Company will maintain appropriate records of risk assessments, training, approvals and investigations to demonstrate compliance.



C Owens
Group CEO
Date: 21/07/2026

Reference:	CHA-HR-POL-0012	Issue No.:	2026-1	Date of Issue	27/07/2026
Originated By:	Tara Pullen	Authorised By:	Claire Owens	Page 5 of 5	