



CT CONSTRUCTION LIMITED

Civil Engineering Contractor

www.ct-construction.co.uk

tel: 01663 749133

BRIBERY – ANTI-BRIBERY POLICY AND PROCEDURE

Policy Statement

The Company values its reputation for applying the highest standards of ethical conduct and integrity in its business activity. This policy outlines the Company's position on preventing and prohibiting bribery, in accordance with the Bribery Act, 2010 and is therefore a legal requirement not just a moral commitment on the part of the organisation. The Company will not tolerate any form of bribery by, or of, its employees, or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Introduction

This policy applies to all employees and officers of the Company including temporary employees, consultants and sub-contractors. Everyone is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the Company.

Definition of a Bribe

A bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity, or
- Knowledge or belief that accepting such a reward would constitute the improper performance of a function or activity.

A relevant activity includes business activities or any activity performed in the course of employment and where the person performing the activity is expected to do so in good faith, impartially or in accordance with a position of trust.

What Constitutes a Bribe?

A bribe might be cash, a gift or other inducement to, or from any person or company. The bribe might be made to ensure that a person or company improperly performs duties or functions to gain any commercial, contractual or regulatory advantage for the company in either obtaining or maintaining Company business.

A bribe might also be made with the intent to gain personal advantage, financial or otherwise, either for the individual or anyone connected with the individual.

What Constitutes a Criminal Offence?

- Where someone offers, promises, gives, requests, receives or agrees to receive bribes

Corporate Entertainment, Hospitality and Promotional Expenditure

The Company permits approved corporate entertainment, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships
- to improve the image and reputation of the Company
- to present the Company's services effectively

The Company will approve business entertainment proposals only if they demonstrate clear business objective and are appropriate for the nature of the business relationship.

Invitations to events (sporting, social, hospitality etc.) both during and outside of normal working hours from sub-contractors and suppliers should be declared to the HR Manager for approval by the Managing Director. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and refusal may be the right response, for example where there could be a real or perceived conflict of interest.

As a general rule, small tokens of appreciation, such as flowers or a bottle of wine/spirits, may be retained by employees. Employees should not accept non-monetary gifts from any one source with a value greater than £25 in any six month period.

Monetary gifts of any value should not be accepted by employees.

If an employee wishes to provide gifts to suppliers, clients or other business contacts they should obtain prior approval from their line manager and inform of the intended recipient, reasons for the gift and the business objective.

In all cases receipts should be provided in accordance with the expenses policy.

Charity Donations

The company considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company may also support fundraising events involving employees.

Procedure

Employees and associated persons are required to co-operate within the provisions of this policy and report any suspicions of bribery to the Managing Director. While any suspicious circumstances should be reported, employees and associated persons are required particularly to report:

- any suspected or actual attempts at bribery
- concerns that other employees or associated persons may be being bribed
- requests for cash payments
- requests for unusual payment arrangements, for example via a third party
- requests for reimbursements of unsubstantiated or unusual expenses
- a lack of standard invoices and proper financial practices

All reports will be promptly investigated in the strictest confidence. Employees will be required to assist in any investigation process and provide statements.

Employees who report instances of bribery in good faith will be supported by the company. The company will ensure that the employee is not subjected to detrimental treatment as a consequence of their report. An instruction to cover up a wrong doing will be regarded as misconduct.

Sub-Contractors and Supply Chain

All sub-contractors and supply chain personnel will be informed of the Company's policy in relation to the Bribery Act. The Site Manager will ensure that a copy of this policy is provided to the relevant individuals and discussed at the initial site set up meeting. Their own legal obligations will be explained to them and the Company will cease to trade with any supplier or work with any sub-contractor found to breach this policy.

Monitoring

The Company keep under continual review the risk of bribery occurring. Any risk will be reported to the Managing Director.

Policy Review and Amendment

This Policy is subject to review and amendment by the Company in line with prevailing legislation and best practice. The Company reserves the right to review and amend this policy at any time.

Oliver JS Tolputt M.Eng
Managing Director



8th February 2022