

## H&S DECORATING SPECIALISTS LTD

### BRIBERY POLICY STATEMENT

H&S Decorating Specialist Ltd Board of Directors will take full responsibility for establishing a culture within the company in which corruption is not tolerated and is outlawed. The company Directors will implement an anti-corruption programme.

The Board of Directors will ensure that all members of staff are fully aware and understand its policy in respect of corruption, and that all employee Directors, Managers and Site Staff are aware consequences should they break the rules. The Managing Director has made a clear statement about the culture he expects.

The company will carry out Anti-Corruption training through the employee's employment with the company.

New employees will be vetted prior to an offer of employment from the company to ascertain as far as is reasonable that they fully comply with H & S Decorating Specialist Ltd anti-corruption policy.

Within their employment contract it will state the following, contractual obligations and penalties relating to corruption. Disciplinary procedures are in place to entitle the company to take disciplinary action against the employee who commits a corrupt act.

The Managing Director will give guidance to all employees on the giving and receiving of all gifts and will include the following:

Bribery is offered, or receiving for something of value, it includes the receiving of cash, hospitality, gifts, or entertainment as an inducement or reward for something improper sometimes it is to secure business and to gain an advantage over a competitor. Bribes are not lawful and do not comply with H & S Decorating Specialists Ltd Code of practise no matter what the circumstance.

Facilitation payments are small gifts usually given to junior members of staff in order to speed up actions the company are duty bound to carry out on time, it is therefore the company policy that these payments should be refused.

You should never give or receive bribes or make or accept improper payments to obtain new business, retain existing business or secure any improper advantage.

Always inform a director if you are offered a bribe or solicit.

Gifts and hospitality including invitation to functions, sporting events, meals and gifts of small value, small tokens of appreciation employees may occasionally receive or offered in connection with H & S Decorating Specialists Ltd works should always be customary and reasonable in terms of value.

Fraud always involves deception and dishonestly, fraud is when you deliberately try to deceive someone, or abuse your position to gain any kind of material advantage, or use or involve anyone else to do so. Fraud is carried out for profit, or to obtain money, property or services unjustly. False claims knowingly entering incorrect hours on time sheets, false claims for materials, travelling expense.

#### **Policy Review and Accessibility**

This Bribery Policy is reviewed annually or when it is no longer valid for continuing suitability by H&S Directors and is available to customers, potential clients and the public on our website and in printed form (on request).

Signed: 

**Michael Higgins, (Managing Director)**

Date: January 2023