

ANTI-BRIBERY AND CORRUPTION POLICY

POLICY — COMPANY FILE

What counts as a bribe, gifts and hospitality, checks, reporting — with the register

KD-PQ-AB-005 Rev A0

Bribery Act 2010: s.1, offering, promising or giving a financial or other advantage to induce or reward improper performance; s.2, requesting, agreeing to receive or accepting one; s.6, bribing a foreign public official. Section 7: a commercial organisation is guilty of an offence if a person associated with it bribes another person intending to obtain or retain business, or an advantage in the conduct of business, for it. An associated person is anyone who performs services for or on its behalf; the Act gives an employee, an agent or a subsidiary as examples and decides the question on all the relevant circumstances, so it can include a subcontractor or consultant (s.8). The bribery must be an offence under s.1 or s.6 (s.7(3)). Section 7(2) gives a defence: the organisation proves it had in place adequate procedures designed to prevent such conduct. The guidance published under s.9 sets out six principles — proportionate procedures, top-level commitment, risk assessment, due diligence, communication (including training), and monitoring and review — and the sections below follow them. The Act applies across the UK. An individual convicted on indictment of an offence under s.1, 2 or 6 faces up to ten years' imprisonment, a fine, or both; an organisation convicted under s.7, a fine (s.11).

1 THE BUSINESS

BUSINESS NAME	COMPANY NO.	PEOPLE EMPLOYED	POLICY DATE	YOUR REV
REGISTERED / TRADING ADDRESS	POLICY OWNER (DAY TO DAY)		REVIEW BY	

2 POLICY — TOP-LEVEL COMMITMENT

This business does not offer, promise, give, ask for or accept bribes — in any form, to or from anyone: a client or its representative, a building control or planning officer, a supplier, a subcontractor, or a public official in the UK or abroad — and does not allow anyone acting for it to do so. We would rather lose the work. This policy applies to directors, employees and agency workers, and to the subcontractors, agents and consultants who act for us.

3 WHAT COUNTS

- A bribe is any financial or other advantage — cash, a gift, hospitality, a discount, a job or a favour for a relative — offered, given, asked for or accepted to make someone do their job improperly, or as a reward for having done so.
- Facilitation payments — small payments to speed up routine official action — are bribes, and the Act gives no exemption for them. Where someone is threatened with harm to life, limb or liberty, their safety comes first: they keep safe, then report what happened at once.
- Construction examples to recognise: a request for a "fee" to be put on a tender list; cash offered to get a variation agreed, a valuation raised or an inspection passed; a supplier's gift while its order is being decided; a request to "look after" someone who can influence an approval; an invoice for a service nobody can describe, or a payment to a third party who did not do the work.
- Political donations are not made in the business's name. Charitable donations and sponsorship are agreed by a director, recorded on the register below, and never linked to a decision about work.

4 GIFTS AND HOSPITALITY

Reasonable and proportionate hospitality is a normal part of doing business and is allowed — but not while a tender, order, variation, valuation, final account or inspection involving the other party is being decided. Cash and cash equivalents (vouchers, gift cards) are never given or accepted. Anything given or received above the limit below is entered on the register the same week and needs a director's agreement; anything declined or returned is entered too.

COMMITMENTS NOT ADOPTED — NUMBER AND REASON

DECLARATION LIMIT £		YEARLY LIMIT FROM ONE PARTY £		REGISTER KEPT BY			
DATE	IN / OUT	OTHER PARTY	WHAT IT WAS	VALUE £	DEAL PENDING?	OUTCOME	AGREED BY
			</				

5 RISK ASSESSMENT AND DUE DILIGENCE

WHERE THE BRIBERY RISK IS FOR THIS BUSINESS

CHECKS ON THE PEOPLE WHO ACT FOR US, AND ON PAYMENTS

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continued

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6 REPORTING AND BREACHES

Report any request for a bribe, offer of one, or suspicion, to the named person the same day — or to another director if the named person is involved. Nobody is treated less favourably for refusing to pay or accept a bribe, or for reporting a genuine concern, even if the business loses work as a result. A breach of this policy by an employee is dealt with as misconduct; a subcontractor or supplier that breaches it may be removed from the approved list (KD-SUB-AR-003) and its order ended in line with the order's own terms.

NAMED PERSON	HOW TO REACH THEM	WHERE REPORTS ARE RECORDED

7 RESPONSIBILITY, COMMUNICATION AND MONITORING

ROLE	NAME	WHAT THEY DO UNDER THIS POLICY

HOW THE POLICY IS COMMUNICATED

HOW IT IS MONITORED, AND WHAT TRIGGERS AN EARLY REVISION

8 SIGNED FOR THE BUSINESS

I adopt this anti-bribery and corruption policy for the business named in section 1. The directors are committed to preventing bribery by anyone acting for it.

SIGNED — PRINTED NAME	POSITION	SIGNATURE	DATE	REVIEW BY

R REVISION HISTORY

Every revision of this document, and every review that found nothing to change. The revision on the front of this sheet is the one you are holding — check kubitdocs.com for the current one before use.

Rev	Date	Class	What changed	Authorised by
D0	2026-09-12	first-issue	First issue.	— not yet approved —
A0	2026-09-12	review	Approved for issue by the author. Content unchanged from the reviewed draft; the draft status strip is removed. No independent third-party review has been carried out.	Author — director, UK principal contractor, SMSTS. Not an independent review.

Class: first-issue · material (the law, a control, a field or the scope changed — past buyers are notified) · editorial (wording or layout only) · review (checked, nothing changed) · withdrawal. Revision prefix D = draft, not approved and not for sale; A = approved for issue by the person named, on the date shown.