

# Anti-Bribery and Corruption Policy

## Confined Space Group Ltd



### Objective

To ensure that Confined Space Group Ltd operates with the highest standards of integrity and professionalism, and to prevent bribery and corruption in all forms within the company and its dealings.

### Scope

This policy applies to all associates, contractors, and any other personnel working for or representing Confined Space Group Ltd. This includes self-employed firefighters providing safety cover and working within confined spaces.

### Legal Framework

**Bribery Act 2010:** Governs the prevention, detection, and punishment of bribery in the UK. It includes offences of bribing another person, being bribed, bribing a foreign public official, and failure to prevent bribery.

### Key Principles

- **Zero Tolerance:** Confined Space Group Ltd has a zero-tolerance approach to bribery and corruption.
- **Integrity and Transparency:** All business dealings must be conducted with integrity and transparency.

### Definitions

- **Bribery:** The offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty.
- **Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery.

### Responsibilities

1. **Associates:**
  - Must not offer, promise, or give any bribe.
  - Must not request, agree to receive, or accept any bribe.
  - Must refuse any bribe offered to them and report the incident to management.
  - Must ensure all dealings are transparent and conducted with integrity.
2. **Management:**
  - Ensure all associates understand and comply with this policy.
  - Provide training and resources necessary to prevent bribery and corruption.
  - Monitor and review business dealings to identify and address any potential risks.
  - Report any suspected bribery or corruption to the appropriate authorities.

## Procedures

### 1. Risk Assessment:

- Conduct regular risk assessments to identify potential areas of exposure to bribery and corruption.
- Implement measures to mitigate identified risks.

### 2. Training and Communication:

- Provide regular training to all associates on anti-bribery and corruption policies and procedures.
- Communicate the importance of adherence to this policy to all associates and stakeholders.

### 3. Reporting and Investigation:

- Encourage associates to report any suspected bribery or corruption without fear of retaliation.
- Investigate all reports thoroughly and take appropriate action.

### 4. Record Keeping:

- Maintain accurate records of all business transactions.
- Ensure all financial and accounting records are transparent and comply with legal requirements.

## Consequences of Non-Compliance

- **Disciplinary Action:** Non-compliance with this policy may result in disciplinary action, up to and including termination of contract or employment.
- **Legal Action:** Associates may face criminal charges for breaches of the Bribery Act 2010, resulting in fines and imprisonment.

## Continuous Improvement

- **Policy Review:** This policy will be reviewed regularly to ensure it remains effective and up-to-date with current laws and regulations.
- **Feedback:** Associates are encouraged to provide feedback on this policy to improve its effectiveness.

By adhering to this policy, Confined Space Group Ltd demonstrates its commitment to ethical business practices and compliance with anti-bribery and corruption laws.

Signed – *Tony Bowman*

Date - 18<sup>th</sup> November 2024