

Bribery & Anti-corruption Policy

Policy statement

Reliable Contractors Ltd is committed to conducting its business ethically and in compliance with all applicable laws, including The **Bribery Act 2010** and the relevant guidelines of ISO 25700:2022 Organisational response to modern slavery guidelines and ethical procurement practices and social responsibility. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships, wherever we operate. This policy will be enforced through robust systems and controls aimed at preventing bribery and corruption at all levels of our operations.

Legislation:

We will uphold all laws relevant to countering bribery and corruption. Specifically, we remain bound by UK laws, including **The Bribery Act 2010**, in respect of our conduct both in the UK and internationally.

- It is a criminal offence to offer, promise, give, request, or accept a bribe.
- Fines or Punishment if found guilty Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine.
- As an Employer, if we fail to prevent bribery, we can face unlimited fines, exclusion from tendering for public contracts, and damage to our reputation.
- In alignment with ISO 25700:2022 Organisational response to Modern Slavery, we ensure that our practices also reflect a commitment to sustainable and ethical business relationships, promoting transparency and integrity across all operations.

Purpose of this policy:

1. **Set out clear expectations:** define responsibilities and those of our employees in observing and upholding our position on bribery and corruption.
2. **Provide Guidance:** offer clear guidance on how to recognise and deal with potential bribery and corruption issues, ensuring ethical conduct in business practices.
3. **Ensure Transparency and Accountability:** Align our actions ethical procurement principles by enhancing visibility and accountability in our business operations.

Scope and compliance

This policy applies to anyone working for Reliable Contracts Ltd or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, volunteers, contractors, external consultants, and business partners, whether based locally or internationally.

- **Training:** All employees will be trained in Bribery & Anti-Corruption during their induction process and will receive regular updates to reinforce compliance and awareness.

Definitions:

Bribery is offering, promising giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them acting improperly, or where the recipient would act improperly by accepting the advantage.

- **An advantage** includes money, gifts, loans, fees hospitality, services, discounts, the award of a contract or anything else of value.
- **A person** acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine and employers that fail to prevent bribery can face an unlimited fine, exclusion from tendering for public contracts, and damage to its reputation.

Who is responsible for the policy?

- **The Managing Director** Brian Greene has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- **Day-to-Day Responsibility:** The Compliance Manager has primary responsibility for implementing, monitoring, and auditing the policy to ensure effectiveness and that controls operate effectively.
- **Managers:** All levels of management are responsible for ensuring their teams understand, adhere to, and are regularly trained on this policy.

Facilitation payments and kickbacks:

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official). They are not common in the UK but are common in some other jurisdictions.

Kickbacks are typically payments made in return for a business favour or advantage.

Third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Gifts & Hospitality and Expenses

This policy allows reasonable and appropriate hospitality, or entertainment given to or received from third parties, for the purpose of:

1. Establishing or maintaining good business relationships
2. Improving or maintaining our image or reputation or
3. Marketing or presenting our products and or services effectively

You are prohibited from accepting a gift from or giving a gift to a third party.

Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable.

Reimbursing a third party's expenses or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

We appreciate that practice varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift, hospitality or payment is reasonable and justifiable. The intention behind it should always be considered.

Record Keeping:

All gifts, donations, and hospitality should be recorded in writing to ensure transparency.

We prohibit donations to political parties and require full disclosure of any gifts, contributions, or hospitality that could present a conflict of interest.

Red Flags for Potential Corruption Risks

if you encounter any of these red flags while working for us, you must report them promptly to the compliance manager or report it in accordance with our Whistle Blowing policy.

We encourage vigilance and due diligence when dealing with third parties. Potential "red flags" include:

- A third party has a history of requiring bribes or "special relationships" with officials.
- A third party demands commissions or fees before entering into a contract.
- A third party insists on payments in cash and refuses to provide proper documentation for any transaction.

Training and Communication

We will ensure continuous training and communication about the importance of ethics, transparency, and anti-corruption practices.

- Induction Training: All new employees will receive training on this policy.
- Ongoing Training: Regular refresher courses will be provided to reinforce the importance of ethical behaviour and the identification of bribery and corruption risks.
- Third-Party Communication: Suppliers, contractors, and business partners will be informed of our anti-bribery and anti-corruption policy and will be expected to comply with its principles.

How to raise concern

Employees and stakeholders are encouraged to raise concerns if they suspect any form of bribery or corruption, ensuring a safe and transparent reporting environment.

- **Immediate reporting:** If you are offered or asked to offer a bribe, or you suspect bribery or corruption, you must report it to your manager or compliance Team immediately. email compliance@reliablecontractors.co.uk your information will be treated in confidence. We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- **Whistleblowing:** Concerns can also be raised through our Whistleblowing Procedure using our confidential reporting system. We commit to protecting anyone who raises concerns in good faith from retaliation.

Breaches of this policy

Failure to adhere to this policy may result in disciplinary action, including dismissal for misconduct or gross misconduct.

External Consequences: Any third party found to have violated this policy will have their relationship with Reliable Contractors terminated immediately.

Signed by:

Brian Greene
Managing Director
Dated: 31st January 2026



Document Ref:	B&AC / POL012	Date Created:	01/01/2019
Issue No:	2	Reviewed Date:	31/01/2026

