

Claret Civil Engineering Ltd

Anti-Bribery and Corruption Policy

November 2022

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1. POLICY STATEMENT

Claret Civil Engineering Ltd (Claret CE)

- 1.1.** At Claret CE, we pride ourselves in being an honest and ethical business. Therefore, we take a zero-tolerance approach to bribery and corruption, and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.
- 1.2.** We do not believe that it is appropriate for employees to accept gifts from clients, suppliers or any other person or company with which Claret Civil Engineering Ltd has (or might have) business connections. This is because it is important to ensure that no employee acts in any way that is inconsistent with the company's objectives or with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business actions or decisions.
- 1.3.** This policy does not prohibit the giving or receiving of gifts or bona fide business hospitality providing that it is for a genuine purpose, reasonable and proportionate to the ordinary course of business, customary in a particular market or they constitute a ceremonial gift on a festival, event or at any other special time.

This policy will be issued to all employees and other interested parties and will be reviewed annually to ensure compliance with legislation and relevance to the company's activities.



A R Gibbons
Managing Director
25th November 2022

2. DEFINITIONS

- 2.1. **Bribery** – Is when a gift or reward is given or promised to improperly gain a commercial or personal advantage which may constitute an offence under the Bribery act 2010. Including offering a bribe, receiving a bribe and bribing regulatory officials.
- 2.2. **Corruption** – Dishonest or fraudulent conduct by those in power, typically involving bribery.

3. SCOPE OF THIS POLICY

- 3.1 This policy applies to all employees at Claret CE whether employed permanently, fixed term or temporary. And includes all consultants, sub-contractors, casual & agency staff and any other persons who work on behalf of the business.
- 3.2 If any employee is in doubt as to whether a potential act constitutes an act of bribery, they should refer the matter to their immediate supervisor, manager or to a director.
- 3.3 The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout Claret Civil Engineering, therefore suitable channels of communication will be maintained as per the company's Whistleblowing policy for suspicions of bribery to be reported.

4. RESPONSIBILITIES

All relevant individuals have a responsibility under this Policy as follows:

- 4.1. **Directors shall:** Not accept any bribes. Ensure that this policy is communicated to all employees and any business or subcontractor working on our behalf. And ensure that any matters relating to bribery or corruption are dealt with according to our policies and procedures.
- 4.2. **Line Managers/Supervisors shall:** Not accept any bribes. Shall ensure the policy is communicated to their teams and ensure that all employees feel able to report any acts of bribery without prejudice or bias.
- 4.3. **Claret CE employees shall:** Not accept any bribes and report any wrongdoing via their line manager or through the Whistle blowing policy.
- 4.4. **Contractors /sub-contractors:** Shall act according to our policy, and not accept any bribes on behalf of the business.

5. RELATED DOCUMENTS

Whistleblowing policy.
Disciplinary and Grievance policy.

6. GIFTS AND HOSPITALITY

- 6.1** Any employee who receives a gift of any kind from an existing or potential business contact must disclose the fact of the gift, its nature and the identity of the sender to their line manager. If the gift is anything other than a small token of appreciation having no substantial financial value, the employee will be required to return the gift to the sender with a polite note thanking him/her and explaining that it is Claret Civil Engineering Ltd.'s policy that employees should not receive gifts.
- 6.2** If, in the opinion of the line manager, the gift might constitute a bribe or other inducement, the employee will be asked to pass the gift to a Director, who will ensure it is returned to the sender with a suitable explanation of the company's policy and asking that it be respected in the future.
- 6.3** In cases where the employee's line manager agrees that the gift was sent to the employee as a token of gratitude for work carried out to a particularly high standard or for an exceptional level of service given, the employee may, at the line manager's discretion, be permitted to retain the gift. Thus, small gifts that are genuinely given as a token of appreciation or gratitude will be acceptable, provided that the employee properly declares the gift in line with this policy and provided that the employee does not subsequently treat the person who sent the gift more favourably than other clients /suppliers, etc.

Benefit Received	Estimated Value	Procedure
Small gift i.e., diary, pen, calendar etc	Up to £15	Can be accepted; no recording or approval is required
Gift i.e., bottle of wine, spirits, vouchers, presents etc	£15 - £100	Inform the business unit Director for further instruction
	£100 - £250	Obtain written approval from the business unit Director for further instruction and record.
	Up to £250	Obtain approval from a Director and await further instruction and record.
Hospitality, lunches, dinners etc	Under £15	Inform business unit Director. No recording required.
	Up to £15	Obtain approval from business unit Director and record.
Hospitality at business functions associated with your role		Inform and obtain verbal consent from business unit Director.
Hospitality at social events i.e., sporting events, golf days, horse racing etc		Obtain approval from a Director and record.

7. WHAT IS UNACCEPTABLE?

- 7.1** It is not acceptable to give or offer a payment, gift or hospitality in the hope that they will give you a business advantage or reward.
- 7.2** It is not acceptable to give or offer a payment, gift or hospitality to a government or regulatory office to facilitate a routine procedure or audit.
- 7.3** It is not acceptable to accept a gift or payment from a third party where it is suspected that a business advantage would be offered.

- 7.4** It is not acceptable to threaten or retaliate against a colleague who has refused to commit bribery or who has raised concerns under this policy.
- 7.5** To engage in any activity that breaches this policy may be regarded as Gross misconduct and result in disciplinary action up to and including dismissal.

8. CHARITABLE DONATIONS AND SPONSORSHIP

- 8.1** Claret CE will only make charitable donations and provide sponsorship that is legal and ethical and in accordance with this policy.

9. RECORD KEEPING

- 9.1** Claret CE keep financial records and have appropriate controls in place to evidence the business reason for gifts and payments made and received.

10. WHISTLEBLOWING

- 10.1** All employees should feel able to notify their manager of any wrongdoing in accordance with this policy. Please refer to the Whistleblowing policy.

11. TRAINING AND COMMUNICATION

- 11.1** Training on this policy is available to all employees and will be communicated to all employees, sub-contractors and business partners & suppliers where appropriate.

12. DOCUMENT CONTROL

REVISION AND AMENDMENT REGISTER				
Date	Page number	Revision details	Issue number	Amendments made by
Feb 2021	All	Annual Review	2	PN
Nov 2022	All	Annual review	3	ZL / PN