

Serv Contracts Limited

Unit 49

The Elms Industrial Estate

Cranfield Park Road

SS12 9EP

Tel: 01268 976655

Anti-Bribery & Corruption Policy 2025

Introduction

As a company Serv Contracts Limited (The Company), one of our core values is to uphold responsible and fair business practices. We are committed to promoting and maintaining the highest level of ethical standards in relation to all of our business activities.

Our reputation for maintaining lawful business practices is of paramount importance and this Policy is designed to preserve these values. The Company therefore has a zero-tolerance policy towards bribery and corruption and are committed to acting fairly and with integrity in all of our business dealings and relationships and implementing and enforcing effective systems to counter bribery and corruption within the company.

Purpose and Scope of Policy

This Policy sets out the Company's position on any form of bribery and corruption and provides guidelines aimed at:

- (i) Ensuring compliance with anti-bribery laws, rules and regulations, within the UK.
- (ii) Enabling employees and persons associated with the Company to understand the risks associated with bribery and corruption and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
- (iii) Providing suitable and secure reporting and communication channels to the Co-Director of the company and ensuring that any information that is reported is properly and effectively dealt with.
- (iv) Creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.
- (v) This Policy applies to all permanent and temporary employees and those acting on behalf of the Company. It also applies to any individual or corporate entity associated with the Company or who performs functions in relation to, or for and on behalf of, the Company, including, but not limited to, Directors, managers, supervisors, employees, contracted workers, casual workers, specialist contractors, consultants and advisors and so far is practicable our suppliers. All employees and associated persons are expected to adhere to the principles set out in this Policy.

Legal obligations

The UK legislation on which this Policy is based on the current the Bribery Act 2010 and it applies to the Company's conduct both in the UK and abroad.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

We are aware that it is an offence in the UK to:

Offer, promise or give a financial or other advantage to another person (i.e., bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct

Request, agree to receive or accept a financial or other advantage (i.e., receive a bribe) for or in relation to improper conduct.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company.

The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

Policy statement

All employees and associated persons are required to:

- (i) Comply with any anti-bribery and anti-corruption legislation that applies in the UK and any jurisdiction in any part of the world in which they might be expected to conduct business on behalf of the company.
- (ii) act honestly, responsibly and with integrity
- (iii) safeguard and uphold the Company's core values by operating in an ethical, professional, and lawful manner at all times.
- (iv) Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.
- (v) The Company recognises that industry practices may vary from company to company. What is considered unacceptable in one company may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees and associated persons at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, refer the matter to a Director immediately.
- (vi) For the Company's rules and procedures in relation to the receipt of business gifts from third parties and corporate hospitality offered to or received from third parties,

please refer to the Company's Gifts from Clients/Suppliers Policy. They form part of the Company's zero tolerance policy towards bribery and they should be read in conjunction with this Policy.

Company's Gifts from Clients/Suppliers Policy

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- (i) The gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- (ii) it is given in the Company's name, not in the giver's personal name.
- (iii) It does not include cash or a cash equivalent (such as gift vouchers).
- (iv) it is of an appropriate and reasonable type and value and given at an appropriate time.
- (v) it is given openly, not secretly.
- (vi) it is approved in advance by a director of the Company.

In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

Responsibilities and Reporting Procedure

It is the contractual duty and responsibility of all Directors, employees and associated persons working for or on behalf of the Company, to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption in accordance with the procedure set out.

You must immediately disclose to a Director of the Company any knowledge or suspicion you may have, that you, or any other employee or associated person, has plans to offer, or give a bribe or to request, agree to receive or accept a bribe in connection with the business of the Company.

For the avoidance of doubt, this includes reporting your own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the co-Directors of the Company but equally to a Supervisor and all employees and associated persons.

The Company encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken.

In the event that you wish to report an instance or suspected instance of bribery, you should follow the steps

- (i) Request a confidential meeting with a Co-Director, Manager or Supervisor of the Company.
- (ii) Bring any physical evidence (if you have any) that bribery and corruption has taken place.

Be assured that the company will ensure that confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances.

The Company is committed to taking appropriate action against bribery and corruption. This could include reporting the matter to the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The Company will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

The company is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith, their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

Record keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off the record” to facilitate or conceal improper payments.

Sanctions for Breach

A breach of any of the provisions of this Policy will constitute a disciplinary offence and will be dealt with in accordance with the Company’s disciplinary procedure.

Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associated persons are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.

Monitoring compliance

As the Company's Co-Directors we have lead responsibility for ensuring compliance with this Policy and will review its contents on a regular basis.

We will be responsible for monitoring its effectiveness and will provide regular reports in this regard to Managers and Supervisors of the Company. As Co-Director we also have overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations.

Communication

As Co-Director we will ensure that all employees understand their personnel responsibilities in relation to the Company's zero tolerance approach to bribery and corruption under this Policy. The company's bribery and corruption policy will also be communicated to all business partners at the outset of the business relationship with them and as appropriate thereafter.

Signed for and on behalf of the company

Signed

Signed

Mr. Jamie Reynolds

Co-Director

Serv Contracts Limited.

Mr. Nick Wettner

Co-Director

Serv Contracts Limited