



BEERE ELECTRICAL SERVICES LIMITED

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Anti-Bribery and Corruption Policy



Produced with the assistance of Lynch Safety Services Ltd

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1. PURPOSE

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery, corruption and anti-competition regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2. POLICY STATEMENT

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery, corruption and anti-competition. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery, corruption and anti-competition in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010 and The Competition Act 1998, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

3. SCOPE

3.1 Who is covered by the policy?

In this policy, third party means any individual or organisation where contact is made as a result of any work activity whilst in the employment of Beere Electrical Services Ltd 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.

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with the company or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions; and
- Anti-competition practices

3.2 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe any public official anywhere in the world.

3.3 Gifts and Hospitality

Employees must not offer or give any gift or hospitality:

- Which could be regarded as illegal or improper, or which violates the recipient's policies; or
- To any public employee or government officials or representatives, or politicians or political parties; or
- Which exceeds £50 in value for each individual gift or £150 in value for each hospitality event (not to exceed a total value of £1,000 in any financial year), unless approved in writing by Rob Beere.

Employees may not accept any gift or hospitality from our business partners if:

- It exceeds £50 in value for each individual gift or £150 in value for each hospitality event (not to exceed a total of £1,000 in any financial year), unless approved in writing by Rob Beere, or;
- If it is in cash; or
- There is any suggestion that a return favour will be expected or implied.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to Rob Beere and donated to charity.

We appreciate that the practice of giving business gifts 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 or hospitality is reasonable and justifiable. The intention behind the gift must always be considered.

Within these parameters, Rob Beere may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, Rob Beere shall put in place a process to maintain a register of all such approvals.

3.4 Facilitation Payments and Kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid.

3.5 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3.6 Charitable Contributions

Personal charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation may be offered or made without the prior written approval of Rob Beere.

All charitable contributions should be publicly disclosed.

3.7 Competition Law

Beere Electrical Services Ltd is committed to The Competition Law and agrees with its ban regarding anti-competitive agreements between firms such as agreements to fix prices or to carve up markets, making it illegal for businesses to abuse a dominant market position.

In order for the organisation to follow competition law, it will ensure that all employees whether temporary, permanent, sub-contractors, agency staff, suppliers or any other person or persons associated with us, will not partake in any of the following anti-competitive behaviours.

Price Fixing

Beere Electrical Services Ltd will not agree to fix prices with competitors, this includes offers of discounts and price increasing at the same time.

Bid Rigging

Beere Electrical Services Ltd will not agree prices nor share bid information with a competitor when bidding on the same contract. Beere Electrical Services Ltd will not ask other companies to bid for work it does not want "cover bidding". Beere Electrical Services Ltd will not pay or make an agreement with others to withdraw or not bid on contracts the organisation wishes to win.

Market or Customer Sharing

Beere Electrical Services Ltd will not agree with others to not approach possible future clients.

Information Sharing

Beere Electrical Services Ltd will not share any sensitive information with others that has been given in confidentiality. This information could be financial, personal, future product development or future business plans.

Product / Service Reduction

Beere Electrical Services Ltd will not agree with others to reduce or withdraw products or services to cause an increase in cost.

4. YOUR RESPONSIBILITIES

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for or under the control of Beere Electrical Services Ltd. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify Rob Beere as soon as possible if you believe or suspect that a conflict with, or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers for breach of this policy.

5. RECORD-KEEPING

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review by the Office Manager and Rob Beere. (Appendix A)

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. The prior written approval of Rob Beere is a mandatory requirement before expenditure over £50.00 is incurred.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept “off-book” to facilitate or conceal improper payments.

6. HOW TO RAISE A CONCERN

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery, corruption or anti-competition, or if you have any other queries or concerns, these should be raised with Rob Beere.

7. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell the Office Manager and Rob Beere as soon as possible if you are offered a bribe by a third party, or are asked or suspect that you will be asked to offer any form of bribe, or believe that you are a victim of any another form of unlawful activity.

8. PROTECTION

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another’s wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one 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 other corruption offence has taken place, or may take place in the future.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If any believes they have suffered any such treatment, they should inform Rob Beere immediately. If the matter is not remedied then the employee should contact the external HR Department. Their details are available from the office.

9. TRAINING AND COMMUNICATION

New employees are provided with the relevant information relating to this policy during the induction process and all existing employees are provided with refresher training on the content and how to comply with this policy at regular intervals. All employees will be required to formally accept conformance with this policy on an annual basis.

Our zero-tolerance approach to bribery, corruption and anti-competition must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

10. WHO IS RESPONSIBLE FOR THE POLICY?

Rob Beere has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Rob Beere has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Personnel at all levels are responsible for ensuring those reporting to them remain aware of this policy and that it is implemented at all times. Where necessary, additional training regarding the details of the policy may be necessary to ensure that the requirements are fully understood.


11. MONITORING AND REVIEW

Rob Beere will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to periodic audit to provide assurance that they are effective in countering bribery, corruption and anti-competition.

All employees are responsible for the success of this policy and should ensure they use it to disclose any actual or suspected wrongdoing.

Employees are invited to provide feedback on any aspect of this policy and to suggest any improvement opportunities that may arise. Any feedback should be forwarded to Rob Beere for consideration and any improvements will be adopted into the policy as early as possible with a revised document issued and communicated at the earliest opportunity.

This policy does not form part of any employee’s contract of employment and it may be amended at any time.

Signed:

Rob Beere
Managing Director
Beere Electrical Services Limited

Dated: December 2024

MONITORING REVIEW TABLE

We will establish appropriate information and monitoring systems to assist the effective implementation of our Anti-Bribery and Corruption Policy. The effectiveness of the Anti-Bribery and Corruption Policy will be reviewed regularly (at least annually) and action taken as necessary.

DATE OF REVIEW	REVIEWED BY	BRIEF DESCRIPTION OF CHANGES	REVIEW DATE
October 2017	M.E.L. (Health & Safety) Consultants Limited	Document creation	October 2018
December 2018	M.E.L. (Health & Safety) Consultants Limited	Amended the company address and reviewed the policy in line with current legislation	December 2019
December 2019	M.E.L. (Health & Safety) Consultants Limited	Reviewed the policy in line with current legislation	December 2020
December 2020	M.E.L. (Health & Safety) Consultants Limited	Reviewed the policy in line with current legislation	December 2021
December 2021	M.E.L. (Health & Safety) Consultants Limited	Reviewed the policy in line with current legislation	December 2022
December 2022	M.E.L. (Health & Safety) Consultants Limited	Sections added on Competition Law and added references to anti-competition throughout the policy	December 2023
December 2023	Lynch Safety Services Limited	Reviewed the policy in line with current legislation	December 2024
December 2024	Lynch Safety Services Limited	Reviewed the policy in line with current legislation	December 2025

Appendix A

EMPLOYEE NAME:	
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Date	Person / Company	Nature of Gift / Hospitality	Offered or Accepted	Amount of Gift