



# **Anti Bribery Policy**

## **2024 – 2025**

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## Anti Bribery Policy Statement

The purpose of this policy is to establish controls to ensure compliance with all applicable Bribery Act Regulations, and to ensure that the business which is undertaken by SG Civil Engineering Ltd (the Company) is conducted in a socially responsible manner.

It is the Company policy to conduct all of the business activities in an honest and ethical manner. The Company will take a zero-tolerance approach to bribery and corruption and are totally committed to acting professionally, fairly and with integrity in all business dealings wherever the company operates.

The Company is also wholly committed to implementing and enforcing effective systems to counter bribery. This policy applies to all individuals working at all levels and grades, including directors, workers (whether permanent, fixed term or temporary).

Although the Company cannot control other stakeholders' approach, we positively encourage similar behaviour with the consultants, contractors, and any other person providing services to us.

We will uphold all law relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, the Company remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct.

This policy document will be brought to the attention of all stakeholders and workers and will be reviewed on a regular basis being no less frequently than annually.



S Gallagher  
Operations Director  
SG Civil Engineering Ltd

1<sup>st</sup> June 2024

## **1.0 Scope of the Policy**

1.1 A bribe is a financial or other advantage offered, promised, given, requested, agreed to, received, or accepted:

- To anyone to persuade them to or reward them for performing their duties improperly or.
- To any public official with the intention of influencing the official in the performance of his duties.

1.2 It is also noted that;

- Hospitality is not prohibited by the Bribery Act.
- Facilitation payments are bribes under the Act.

1.3 This Policy will cover the following;

- Bribes.
- Gifts and hospitality.
- Facilitation payments and 'kickbacks'.
- Donations.

## **2.0 Bribes**

2.1 All Directors, Managers, Supervisors and Workers must not engage in any form of facilitation payments (bribes), either directly or through any third party.

## **3.0 Gifts & Hospitality**

3.1 Compliance with the Policy does not mean that the Company cannot entertain its customers, suppliers, and partners to get to know them better in the ordinary course of business. It does mean that entertainment needs to be appropriate and relevant.

3.2 Similarly, gifts may still be given or received where custom dictates; however, they should be at an appropriate level. When giving or receiving gifts or entertainment, it must be done without the intention of the recipient then being subjected to improper influence by a provider.

3.3 In certain circumstances gifts and hospitality may amount to bribery and all individuals must comply strictly with the Company ethics policy in respect of gifts and hospitality.

3.4 The Company will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of their duties.

## **4.0 Facilitation Payments & 'Kickbacks'**

4.1 The Company do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by a business / government official. Kickbacks are typically payments made in return for a business favour or advantage. All individuals at all levels within the Company must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## **5.0 Donations**

5.1 Charitable support and donations are acceptable (and indeed are encouraged). However, all individuals at all levels within the Company must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. The Company will only make charitable donations that are legal, ethical and not used to gain any commercial advantage.

## **6.0 Record Keeping**

6.1 The Company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

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

## **7.0 Raising Concerns**

7.1 All individuals will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No worker will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

7.2 Where the individuals are unsure whether a particular act constitutes bribery or corruption, or they have any other queries or concerns, these should be raised with the directors.

## **8.0 Communication**

8.1 The directors will regularly review the effectiveness of this policy. Internal control systems and procedures will be subject to audit under the external third-party audit process.