



Anti-Bribery & Corruption Policy

Effective Date: November 2025 – Next Review: November 2026

1. Policy Statement

GEODEC Limited, is committed to the highest standards of ethical conduct, honesty, and integrity.

The Company operates a **strict zero-tolerance approach** to bribery and corruption, in accordance with the **Bribery Act 2010**, which applies to all of our activities in the UK and overseas.

This policy mandates that **no employee, subcontractor, agent, or third party acting on behalf of GEODEC Limited shall engage in any form of bribery, corruption, improper influence, or facilitation payments**, whether directly or indirectly.

Compliance with this policy is **mandatory**. Breaches may lead to **dismissal, termination of contract, civil action, and criminal prosecution**.

2. Legal Framework

This policy specifically complies with and refers to:

- **Bribery Act 2010**, including:
 - Section 1 – Offences of bribing another person
 - Section 2 – Being bribed
 - Section 6 – Bribing a foreign public official
 - Section 7 – Failure of commercial organisations to prevent bribery
- **Ministry of Justice “Adequate Procedures” Guidance**, covering:
 1. Proportionality
 2. Top-level commitment
 3. Risk assessment
 4. Due diligence
 5. Communication & training
 6. Monitoring & review

GEODEC Limited is fully committed to these principles and implements procedures proportionate to our business size and risk level.

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Company Number: 16851519
Registered in England and Wales



3. Scope

This policy applies to:

- All employees (full-time, part-time, temporary)
- Directors and officers
- Subcontractors
- Labour-only subcontractors
- Agency workers
- Consultants
- Suppliers and service providers
- Any person performing work for or representing GEODEC Limited

Compliance is a **condition of employment** and a **condition of engagement/contract**.

4. What Constitutes Bribery and Corruption?

Bribery is offering, giving, receiving, or requesting **any advantage** with the intention of influencing a decision or securing a business advantage.

This includes (but is not limited to):

- Cash payments
- Gifts, hospitality, or entertainment intended to influence a decision
- Kickbacks or referral payments
- Preferential treatment
- Undisclosed commissions
- Inflated or false invoices
- Donations linked to obtaining work
- Offering work, contracts, services, discounts, or benefits in exchange for favours

All forms of bribery are prohibited, regardless of value or intent.

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5. Absolute Prohibitions

The following are strictly prohibited:

5.1 Bribes

No one may offer, give, receive, or accept bribes under any circumstances.

5.2 Facilitation Payments

The Company prohibits facilitation payments of any kind, regardless of local customs or practices.

5.3 Improper Gifts & Hospitality

Gifts/hospitality that could influence a decision, create an obligation, or appear improper are banned.

5.4 Third-Party Bribery

GEODEC Limited may be **criminally liable** if a third party engages in bribery on our behalf.

5.5 Bid-rigging or collusion

Any involvement in tender manipulation, collusion, or price-fixing is strictly prohibited.

6. Gifts, Hospitality & Promotional Items

GEODEC Limited permits reasonable, proportionate hospitality **only where:**

- It is openly given
- It is not excessive
- It cannot be seen as influencing a business decision
- It is approved in advance if over £25

Banned:

- Cash or cash-equivalent gifts
- Vouchers over £25

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- Holiday packages, expensive meals, or entertainment events
- Gifts given during tendering or procurement processes

A **Gifts & Hospitality Register** is maintained and checked periodically.

7. Donations & Sponsorship

- **Political donations are prohibited.**
- Charitable donations must be transparent, approved by a Director, and not used to secure advantage.

8. Due Diligence for Subcontractors & Suppliers

GEODEC Limited will undertake appropriate checks, which may include:

- Confirmation of identity & legitimacy
- Credit & background checks
- Confirmation of insurance and trading history
- Review of their anti-bribery procedures
- Contractual clauses requiring compliance with this policy

We reserve the right to reject, suspend, or terminate relationships with third parties who do not meet our standards.

9. Responsibilities

Directors

- Demonstrate top-level commitment
- Assess bribery risk annually
- Provide resources for compliance
- Ensure subcontractor/supplier compliance
- Authorise disciplinary actions for breaches

Employees & Subcontractors

Must:

- Read, understand, and comply with this policy
- Act with integrity at all times
- Report any concerns immediately

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- Refuse any bribe or improper benefit
- Disclose conflicts of interest

Failure to comply may result in removal from site or termination of contract.

10. Reporting Bribery or Corruption

Any concern, suspicion, or known breach **must be reported immediately** to:

Compliance Lead / Director:

Director: George Matthews

Email: enquiries@geodec.co.uk

Phone: 07908 403229

Confidentiality & Protection

- Reports can be made confidentially
- GEODEC Limited prohibits retaliation against whistle-blowers
- Anonymous reporting is permitted, though may limit investigation scope

All reports are fully investigated and documented.

11. Record Keeping

To comply with the Bribery Act 2010, GEODEC Limited maintains:

- Transparent and accurate financial records
- Contracts and payment records
- Due-diligence documentation
- Gifts and hospitality register
- Training and induction records

No false or misleading records may be created under any circumstances.

12. Training & Communication

- Anti-bribery training forms part of employee and subcontractor inductions
- The policy is accessible on company systems and the GEODEC Limited website
- Updates will be communicated promptly
- Additional training may be provided for higher-risk roles

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13. Enforcement & Penalties

Breaches of this policy may result in:

For Employees

- Disciplinary action up to dismissal
- Criminal investigation
- Civil recovery of losses

For Subcontractors/Suppliers

- Immediate termination of contract
- Removal from approved supplier lists
- Reporting to relevant authorities
- Civil recovery of losses

For GEODEC Limited

Failure to prevent bribery (Section 7) can result in:

- Unlimited fines
- Exclusion from public sector tenders
- Reputational damage

GEODEC Limited will fully cooperate with law enforcement.

14. Monitoring & Review

- Policy reviewed annually or following legislative changes
- Risk assessments performed at least once per year
- Compliance logs audited quarterly

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15. Approval

This Anti-Bribery & Corruption Policy is approved and adopted by the Director.

Signed By:

George Ryan Matthews

24th November 2025

office@geodec.co.uk