



## 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.

GEODEC Limited | [office@geodec.co.uk](mailto:office@geodec.co.uk) | [www.geodec.co.uk](http://www.geodec.co.uk)

Company Number: 16851519

VAT Number: 507501225

Registered in England and Wales



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### 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.



## 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

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- Vouchers over £25
- 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

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- Act with integrity at all times
- Report any concerns immediately
- 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](mailto: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

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- 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

## 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



## 15. Approval

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

Signed By:

George Ryan Matthews

24<sup>th</sup> November 2025

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