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SPECIALITY SECURITY INVESTIGATION GROUP

BRIBERY POLICY

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BRIBERY POLICY

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1. Introduction

Speciality Security Investigation Group Limited is fully committed to preventing bribery and corruption in all our business dealings and relationships, and to adhering to all relevant legislation, including the Bribery Act 2010.

Bribery and corruption, in any form, are completely unacceptable and will lead to disciplinary measures where allegations are confirmed. Speciality Security Investigation Group Limited enforces a zero-tolerance stance on such matters.

This Policy outlines the key principles necessary to achieve these objectives, detailing the responsibilities of both the company and its employees to ensure compliance with the Act.

This Policy, along with any associated procedures, provides guidance for employees on how to prevent, identify, and address bribery and corruption issues.

2. Scope

This Policy applies to all employees and covers all activities undertaken by Speciality Security Investigation Group Limited. In our interactions with third parties, we will encourage the adoption of practices and arrangements that align with the principles set out in this policy.

3. Compliance

To ensure all employees are aware of their responsibilities under this Policy, each employee must, at the time they commence employment with Speciality Security Investigation Group Limited, and annually thereafter, confirm during their annual appraisal or a formal one-to-one meeting with their line manager that they have read and understood this Policy.

Failure to comply with this Policy may result in disciplinary action, which could include dismissal.



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4. What is Bribery?

Bribery refers to an inducement or reward offered, promised, or provided to gain a personal, commercial, regulatory, or contractual advantage. This can take various forms, including:

- Offering a bribe to another individual or organisation;
- Accepting a bribe from an individual or organisation.

Bribes do not necessarily have to be monetary and may include gifts or hospitality.

Bribery is a criminal offence.

Failure by Speciality Security Investigation Group Limited to implement adequate procedures to prevent bribery may also result in an offence.

Under the Act, the maximum penalty for individuals is ten years imprisonment and/or unlimited fines. For organisations, failure to prevent bribery carries an unlimited fine.

5. Speciality Security Investigation Group Limited's Stance on Bribery

Speciality Security Investigation Group Limited explicitly forbids employees or associated persons from offering or accepting bribes or illegal inducements, either to or from anyone, for any purpose.

Using an associated person or third party as an intermediary to channel bribes is also strictly prohibited.

The company is committed to the prevention, deterrence, and detection of bribery through:

- Implementing procedures to prevent bribery;
- Ensuring all employees are aware of their responsibilities under this Policy;
- Providing training to employees exposed to bribery risks, helping them recognise and address bribery and corruption;
- Including training on this policy as part of the induction process for all new employees, and reminding employees of their responsibilities during their annual appraisal;
- Encouraging employees to be vigilant and report any concerns about bribery or corruption, using Speciality Security Investigation Group Limited's Public Interest Disclosure (whistleblowing) policy if necessary;
- Investigating any allegations of bribery and assisting authorities with any resulting prosecutions;
- Taking disciplinary action, including dismissal, against anyone involved in bribery or corrupt activities;
- Incorporating anti-bribery clauses in employment and commercial contracts.



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6. Preventing Bribery – Adequate Procedures

An organisation can defend itself against prosecution for bribery offences if it has implemented “adequate procedures” to prevent bribery. What is considered “adequate” depends on the bribery risks, the nature, size, and complexity of the organisation, and the procedures must be proportionate to the level of risk.

A “third party” refers to any individual or organisation that conducts business with Speciality Security Investigation Group Limited, such as external service providers, suppliers, contractors, and clients.

An “associated person” is anyone who performs services for or on behalf of Speciality Security Investigation Group Limited, including agents, suppliers, and contractors.

The Government has outlined six principles that organisations should follow when implementing these procedures:

- Top Level Commitment
- Risk Assessment
- Proportionate Procedures (in relation to the bribery risks faced)
- Due Diligence
- Communications (ensuring the anti-bribery policy and procedures are embedded and understood)
- Monitoring and Review

Speciality Security Investigation Group Limited’s approach incorporates these six principles.



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7. Employee Responsibilities

Employees must read and understand this Policy, along with any supplementary Anti-Bribery Procedures provided by Speciality Security Investigation Group Limited. Senior managers are responsible for ensuring that all employees have access to a copy of the Policy and supporting Procedures.

The prevention, detection, and reporting of bribery and other forms of corruption are the responsibility of every employee at Speciality Security Investigation Group Limited.

Employees must:

- Comply with this Policy;
- Avoid activities that breach this Policy or could be perceived as a breach;
- Seek advice before accepting gifts or hospitality;
- Raise concerns promptly if they suspect or believe a breach of this Policy has occurred or may occur.

Employees must not:

- Offer or promise any payment, gift, or hospitality with the expectation or hope of receiving a personal, commercial, regulatory, or contractual advantage, or to reward such an advantage;
- Offer or promise a payment, gift, or hospitality to a government official, agent, or representative to expedite or facilitate a procedure;
- Accept payment from a third party that they know or suspect is offered with the expectation of obtaining a business advantage;
- Accept a gift or hospitality from a third party if they know or suspect it is offered with the expectation that Speciality Security Investigation Group Limited will provide a business advantage in return;
- Retaliate, threaten, or victimise anyone who has refused to engage in bribery or corrupt practices, or who has raised concerns under this Policy.

The list above is not exhaustive but provides examples of conduct that may breach this Policy.

If any employee is uncertain about a situation they find themselves in, they should always seek advice from their line manager before it escalates into a more serious issue.



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8. Consequences of Improper Behaviour

All allegations of bribery or corrupt practices will be investigated in accordance with Speciality Security Investigation Group Limited's Disciplinary Policy.

Where an investigation confirms improper behaviour, Speciality Security Investigation Group Limited's disciplinary procedures will be followed, which may lead to dismissal.

If a criminal offence is suspected, Speciality Security Investigation Group Limited will report the matter to the Police.

Where possible, the company will seek to recover any losses caused by bribery or corruption.

9. Gifts & Hospitality

Gifts, offers of hospitality, or favours from or to a third party, contractor, client, or partner organisation of Speciality Security Investigation Group Limited may be seen as potential bribes.

As such, employees should never accept or offer gifts, hospitality, favours, or any other form of inducement that could influence, or appear to influence, their actions or decisions related to their work. In limited circumstances, and as part of their official duties, it may be appropriate to offer or accept gifts of nominal value, such as branded promotional items like pens, calendars, or coffee mugs. Small gifts, such as a box of chocolates at Christmas, may also be acceptable.

However, gifts of alcohol or offers of hospitality, no matter how small, should not automatically be accepted by employees of Speciality Security Investigation Group Limited, nor should they offer such gifts.

Employees must consult the Managing Director for guidance on whether it is appropriate to offer or accept gifts or hospitality. Unless in the situations outlined in paragraph 3, employees should not accept a gift unless they are certain that it would not lead to any question regarding their role as a Speciality Security Investigation Group Limited employee.

All offers of gifts and hospitality, whether accepted or refused, should be recorded in the gifts and hospitality register.

10. Review

This policy will be reviewed regularly and at least every three years from its approval. Any necessary reviews due to changes in legislation will be carried out immediately.