

# **Anti-Bribery and Corruption Policy**

Trust Works Facilities Management

Effective Date: 17.06.2025

Review Date: 17.06.2026

## **1. Policy Statement**

Trust Works Facilities Management is committed to conducting business with honesty and integrity. We do not tolerate any form of bribery or corruption and expect all employees, agents, subcontractors, and business partners to uphold these standards.

This policy sets out our responsibilities under the Bribery Act 2010 and provides guidance on recognising and preventing bribery and corruption.

## **2. Scope**

This policy applies to:

- All employees, directors, and officers of Trust Works Facilities Management.
- Contractors, suppliers, consultants, and anyone acting on behalf of the company.

## **3. What is Bribery?**

Bribery is the offering, promising, giving, accepting, or soliciting of a financial or other advantage to induce or reward improper performance of a function or activity.

Examples of bribery include:

- Offering a customer a gift or incentive to secure a contract.
- Receiving hospitality or payments in return for awarding a contract.

## **4. Prohibited Conduct**

Trust Works strictly prohibits:

- Giving or offering bribes to any individual or organisation.
- Receiving or accepting bribes from any party.
- Making facilitation payments (small unofficial payments made to speed up routine government actions).
- Engaging in indirect bribery through third parties.

## **5. Gifts and Hospitality**

Reasonable and proportionate gifts and hospitality are permitted only when:

- They are not intended to influence decision-making or gain an unfair advantage.
- They are approved in accordance with internal procedures.
- They are properly recorded in the company's gift and hospitality register.

## **6. Responsibilities**

Management:

- Ensure effective implementation of this policy.
- Provide training and support.
- Investigate suspected breaches promptly and thoroughly.

Employees and Representatives:

- Must read, understand, and comply with this policy.
- Must report any concerns or suspicions of bribery or corruption.

## **7. Reporting Suspicions**

Employees should report any suspected bribery or corruption to their line manager or a designated compliance officer. Reports will be treated in confidence and investigated thoroughly.

## **8. Consequences of Breach**

Breaches of this policy may result in:

- Disciplinary action, including dismissal.
- Criminal prosecution for individuals involved.
- Reputational and financial damage to the business.

## **9. Review and Monitoring**

This policy will be reviewed annually and updated as necessary. All staff will be reminded of their responsibilities under this policy as part of their ongoing training.

## **10. Signed & Approved**

Signed: H.Allen

Name: Hadyn Allen , Managing director

Date: 17.06.2025