



STRAVICA

**Anti-Bribery &
Corruption Policy**

1. Introduction, Purpose and Scope

1.1 Introduction

Stravica Ltd is a UK-registered company providing facilities management, refurbishment and compliance services to public- and private-sector clients. Integrity is central to our licence to operate under Crown Commercial Service (CCS) frameworks. This policy establishes the mandatory standards for preventing bribery and corruption across every Stravica-controlled activity.

1.2 Purpose

The purpose of this document is to:

- a) Define Stravica's zero-tolerance approach to bribery and corruption.
- b) Provide practical guidance to employees, subcontractors and partners on identifying, preventing and reporting corrupt conduct.
- c) Demonstrate compliance with the Bribery Act 2010 and associated UK legislation.
- d) Protect Stravica, our people and our clients from criminal, civil and reputational risk.

1.3 Scope

This policy applies to:

- All employees, directors and officers (permanent, temporary or agency).
- All subcontractors, suppliers, consultants, intermediaries and agents acting for or on behalf of Stravica.
- All business activities within the UK and any overseas contracts or partnerships entered into by Stravica Ltd.

It covers conduct in procurement, tendering, contract negotiation, project delivery, community engagement, sponsorship, donations, and dealings with any public officials or regulators.

1.4 Alignment with Other Policies

This policy must be read alongside the:

- Code of Conduct
- Conflicts of Interest Policy

- Whistleblowing Policy
- Gifts & Hospitality Procedure
- Financial Controls Manual
- Procurement & Supplier Due Diligence Procedure

Collectively these form Stravica's Integrity Management System (IMS).

2. Policy Statement and Core Principles

2.1 Zero Tolerance

Stravica Ltd will not tolerate bribery or corruption in any form. We prohibit the offering, giving, requesting, agreeing to receive or accepting of any undue financial or other advantage for the purpose of influencing a decision or securing an improper business advantage.

2.2 Ethical Business Culture

All business must be conducted honestly, transparently and objectively. Commercial success will never depend on unethical behaviour. Leadership at every level must model integrity and ensure employees feel empowered to challenge inappropriate conduct.

2.3 Continuous Compliance

Stravica maintains “adequate procedures” as required by Section 7 of the Bribery Act 2010.

These include:

- Proportionate governance and controls;
- Risk-based due diligence;
- Clear communication and training;
- Confidential reporting channels;
- Regular monitoring and review.

2.4 Consequences of Breach

Breaches may result in disciplinary action up to and including dismissal, termination of contracts, self-reporting to the authorities, exclusion from public tenders and prosecution under UK law.

2.5 Corporate Responsibility

The Managing Director and Board affirm full commitment to preventing bribery and corruption, and to providing adequate resources to implement this policy effectively across all Stravica operations.

3. Legal and Regulatory Framework

3.1 Primary Legislation

This policy enforces compliance with:

- Bribery Act 2010 (Sections 1, 2, 6 and 7).
- Proceeds of Crime Act 2002 (money-laundering offences).
- Criminal Finances Act 2017 (failure to prevent facilitation of tax evasion).
- Public Contracts Regulations 2015 and Utilities Contracts Regulations 2016 (exclusion for corruption offences).
- Companies Act 2006 (directors' duties of integrity).

3.2 Related Standards and Guidance

- UK Ministry of Justice: Guidance on Procedures under Section 9 of the Bribery Act 2010.
- ISO 37001:2016 – Anti-Bribery Management Systems.
- Crown Commercial Service Supplier Code of Conduct (2023).
- Transparency International UK Guidance on Adequate Procedures.

3.3 Jurisdictional Coverage

This policy applies to all activities conducted in the UK and any other jurisdictions in which Stravica operates. Employees must also comply with any stricter local anti-corruption laws where they apply.

4. Definitions

4.1 Bribery

Offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to induce or reward the improper performance of a relevant function or activity.

4.2 Corruption

Abuse of entrusted power for private gain. This includes extortion, fraud, collusion, nepotism or any behaviour that distorts decision-making for personal benefit.

4.3 Facilitation Payment

A small, unofficial payment made to secure or expedite a routine action by a public official. All facilitation payments are strictly prohibited.

4.4 Kickback

A payment or return of part of a sum received as a reward for awarding or influencing a contract. Prohibited.

4.5 Public Official

Any elected or appointed government employee, officer, or representative, including employees of state-owned enterprises or international organisations.

4.6 Associated Person

Any individual or organisation performing services for or on behalf of Stravica Ltd, including agents, subcontractors, consultants, suppliers, and joint-venture partners.

4.7 Adequate Procedures

The systems and controls designed to prevent bribery, consistent with the six principles of the Ministry of Justice guidance: Proportionate Procedures, Top-Level Commitment, Risk Assessment, Due Diligence, Communication & Training, Monitoring & Review.

5. Roles, Responsibilities and Governance Structure

5.1 Board of Directors

- a) Provide strategic oversight and approve the policy and any subsequent revisions.
- b) Receive quarterly compliance reports and incident summaries.
- c) Ensure sufficient resources are allocated to maintain adequate procedures.
- d) Set an ethical culture through visible leadership.

5.2 Managing Director (MD)

- a) Accountable for overall implementation and enforcement.
- b) Signs annual Anti-Bribery Statement confirming compliance with the Bribery Act 2010.
- c) Chairs Management Reviews of the Anti-Bribery Management System (ABMS).

5.3 Head of Governance & Compliance (HGC)

- a) Policy Owner and designated Compliance Manager under this policy.
- b) Maintains the risk assessment, training programme and compliance registers.
- c) Provides guidance on gifts, hospitality, conflicts and due diligence.
- d) Leads investigations into alleged breaches and reports outcomes to the MD.

5.4 Functional Leads (Procurement, Finance, Operations)

- a) Embed controls in their functional procedures.
- b) Conduct supplier and subcontractor due diligence before engagement.
- c) Maintain auditable records of all approvals and transactions.

5.5 Managers and Supervisors

- a) Communicate this policy to their teams.
- b) Ensure toolbox talks and site briefings cover anti-bribery expectations.
- c) Monitor day-to-day compliance and escalate concerns.

5.6 All Employees and Contractors

- a) Read, understand and comply with this policy and related procedures.
- b) Complete mandatory training and annual declarations.
- c) Avoid any behaviour that could constitute or imply bribery.
- d) Promptly report any suspicion or offer of a bribe using the reporting channels described later in this policy.

5.7 Suppliers and Third Parties

All suppliers and third-party partners must adhere to equivalent anti-bribery standards. Contracts will include clauses granting Stravica the right to audit and terminate where breaches occur.

5.8 Governance Committees

The Integrity & Compliance Committee, chaired by the MD and including the HGC, Finance Director and HSQE Lead, meets quarterly to:

- Review risk assessments and incidents.
- Monitor training completion and audit findings.
- Approve high-risk third-party engagements or charitable donations.

6. Prohibited Conduct Overview

6.1 Stravica Ltd prohibits, without exception, the offering, giving, requesting, agreeing to receive, or accepting of any advantage that might improperly influence a business decision or create the perception of impropriety.

6.2 This prohibition extends to all interactions with public officials, private entities, clients, suppliers, subcontractors, and community partners, whether within or outside the United Kingdom.

6.3 Improper conduct includes but is not limited to:

- a) Gifts or hospitality intended to obtain or retain business;
- b) Facilitation payments, “grease” payments, or kickbacks;
- c) Improper political or charitable contributions;
- d) Employment or contractual offers made to gain an advantage;
- e) Manipulation of procurement, invoices, or financial records;
- f) Misuse of confidential information for personal or third-party gain.

7. Gifts and Hospitality (G&H)

7.1 Principle.

Stravica recognises that modest and transparent gifts or hospitality can foster

legitimate business relationships, but any act capable of influencing, or appearing to influence, decision-making is strictly prohibited.

7.2 Permissible Circumstances.

G&H may only be offered or accepted when it:

- a) Is reasonable, proportionate, and infrequent;
- b) Complies with all applicable laws and client policies;
- c) Is clearly disclosed and approved in advance where thresholds apply;
- d) Serves a legitimate business purpose (e.g., project-completion meal);
- e) Cannot reasonably be perceived as a reward, inducement, or favour.

7.3 Prohibited Circumstances.

G&H must not be offered or accepted if it:

- a) Occurs during an active or anticipated tender, bid, or evaluation period;
- b) Includes cash, cash equivalents, or loans;
- c) Is made in secret or without disclosure;
- d) Is excessive in value or frequency;
- e) Is offered to, or received from, a public official without prior approval from the Head of Governance & Compliance (HGC);
- f) Could cause embarrassment if publicly disclosed.

7.4 Monetary Thresholds and Approvals.

- Token items £30 – Permitted; no record required unless linked to a tender.
- Standard G&H £31–£100 – Pre-approval by Line Manager; record in the G&H Register within 5 working days.
- High-value > £100 or any travel, accommodation or entertainment – Pre-approval by HGC before acceptance or offer; mandatory entry in G&H Register.
- Public-official G&H – Always pre-cleared by HGC, regardless of value.

7.5 Recording Requirements.

All non-token G&H must be recorded with:

- Date, nature and value;
- Names and organisations of giver/receiver;

- Business context;
- Approval reference.

7.6 Cultural Sensitivity.

If refusal may offend cultural norms, the gift may be accepted on behalf of Stravica, reported to HGC within 24 hours, and handled according to corporate guidance (e.g., donation to charity or shared display use).

7.7 Supplier Relationships.

Suppliers must be informed of Stravica's zero-tolerance stance and may not provide G&H to Stravica staff above the thresholds defined. Any non-compliant supplier behaviour must be reported immediately.

8. Facilitation Payments and Kickbacks

8.1 Policy Position.

Stravica Ltd forbids all facilitation payments and kickbacks, regardless of amount or local custom.

8.2 Facilitation Payments Defined.

Small, unofficial payments made to secure or expedite routine governmental actions (e.g., permit processing, customs clearance). These are unlawful under the Bribery Act 2010.

8.3 Kickbacks Defined.

Improper payments or rebates made to influence business awards, typically concealed within commissions, inflated invoices, or sub-contracts.

8.4 Preventive Controls.

- a) Dual-authorisation for all payments and reimbursements;
- b) Independent verification of invoices;
- c) Mandatory written contracts specifying services and deliverables;
- d) Audit trails maintained within finance systems.

8.5 Personal Safety Exception.

Where refusal could endanger personal safety:

- Keep any payment to the absolute minimum;

- Request a receipt where feasible;
- Document time, date, amount, and reason;
- Report to HGC within 24 hours for formal incident logging and review. No disciplinary action will be taken if payment was unavoidable and reported immediately.

9. Political and Charitable Contributions

9.1 Political Contributions

Stravica Ltd does not contribute, directly or indirectly, to political parties, candidates, or campaigns, nor permit the use of company funds, time, or assets for political purposes.

9.2 Employee Political Activity

Employees may engage in lawful political activity only in a personal capacity and outside working hours. They must not reference their Stravica role or resources in any political context.

9.3 Charitable Donations and Sponsorships

Stravica supports legitimate charitable initiatives consistent with our Corporate Social Responsibility (CSR) objectives. To ensure donations are not used as disguised bribes:

- a) All charitable donations or sponsorships \geq £250 require prior HGC approval;
- b) Due diligence must confirm the organisation's legitimacy and no political affiliation;
- c) Payments must be made to official accounts only;
- d) Public disclosure of approved donations will be included in CSR reports.

9.4 Employee Volunteering

Volunteering or community involvement supported by Stravica must align with this policy; employees must not seek or offer personal benefit through sponsored activities.

10. Conflicts of Interest

10.1 Definition

A conflict of interest occurs when personal, financial or other interests compete with the interests of Stravica or its clients, potentially influencing decisions or actions.

10.2 Examples

- Holding a financial stake in a supplier or competitor;
- Family or close relationship with a contractor under evaluation;
- Personal gifts or favours received from vendors under procurement;
- Secondary employment or consultancy that creates bias.

10.3 Obligation to Disclose

All personnel must disclose any potential conflict to their Line Manager and HGC immediately using the Conflict of Interest Declaration Form (Appendix B). Failure to disclose constitutes a disciplinary offence.

10.4 Management of Conflicts

- a) Documented review by HGC and senior management;
- b) Mitigation actions (e.g., recusal from procurement decisions, divestment of interests);
- c) Entry into the Conflict of Interest Register maintained by Compliance.

11. High-Risk Areas and Operational Controls

11.1 Procurement and Sub-Contracting

- a) All procurement must follow competitive and transparent processes using pre-qualified suppliers through approved frameworks or tenders;
- b) Single-source procurements require documented justification and HGC approval;
- c) Supplier due diligence includes financial standing, ownership, sanctions screening, and anti-bribery credentials;
- d) All contracts must contain anti-bribery and termination clauses;

e) Supplier performance and payments must be verified by separate functions (Purchase Order raiser ≠ approver of invoice).

11.2 Tendering and Bidding Activities

- a) Only authorised bid team members may communicate with clients or consultants;
- b) All client meetings recorded in the Bid Contact Log;
- c) Strict prohibition on soliciting confidential information from competitors or client staff;
- d) Gifts and hospitality barred throughout the tender period.

11.3 Agents, Consultants, and Intermediaries

- a) Engagement only under written contract reviewed by Legal and HGC;
- b) Fees must be reasonable and commensurate with actual services rendered;
- c) Payment made only to verified bank accounts in the consultant's name and jurisdiction of operation;
- d) Enhanced due diligence for any public-sector lobbying or foreign representation.

11.4 Site-Based Operations

- a) All site managers must deliver toolbox talks on bribery prevention at mobilisation and quarterly thereafter;
- b) Local registers for G&H, cash advances and suppliers to be maintained and audited monthly;
- c) No cash payments to suppliers or regulators except where pre-approved and receipted;
- d) Use of approved waste carriers and licensed compliance vendors only.

11.5 Public-Official Engagements

- a) All meetings with public officials require HGC pre-notification and recorded minutes;
- b) No offers of gifts, hospitality or benefits without explicit written approval;
- c) At least two Stravica representatives should attend where practicable to ensure transparency.

11.6 Cash Handling

- a) Cash transactions minimised and subject to dual sign-off;
- b) Petty cash floats capped at £200 per site and reconciled monthly;

- c) No foreign currency payments without Finance approval and record of conversion rate.

11.7 High-Risk Geographies and Projects

Where operations occur in jurisdictions ranked as high-risk on Transparency International's Corruption Perceptions Index (CPI score below 50):

- a) Enhanced due diligence and third-party audits must be performed;
- b) Additional staff training and local controls introduced;
- c) Project-specific risk assessments documented and approved by the MD and HGC before mobilisation.

12. Record-Keeping and Financial Controls

12.1 Objective

To ensure every financial transaction, decision, and engagement can be traced, verified, and evidenced as legitimate and transparent.

12.2 Core Requirements

- a) All accounts, invoices, purchase orders, tenders, and expense claims must be accurate, supported, and approved through the Finance Management System.
- b) No undisclosed or unrecorded accounts, funds, or assets may be established for any purpose.
- c) All G&H, facilitation-payment incidents, and charitable contributions must be logged in their dedicated registers within five working days.
- d) Accounting records must be maintained in accordance with the Companies Act 2006, UK GAAP, and the Bribery Act 2010.

12.3 Expense Controls

- a) Expense claims must be submitted with original receipts, a clear business rationale, and prior approval from a Line Manager.
- b) Claims without valid documentation will be rejected.
- c) Expenses relating to hospitality, entertainment, or third-party benefits must identify all attendees and business purpose.

12.4 Audit Trail Integrity

All electronic records are retained for a minimum of six years and backed up to secure cloud storage. Finance and Compliance jointly review random samples quarterly to confirm completeness.

12.5 Finance and Compliance Segregation

Finance oversees monetary accuracy; Compliance verifies the ethical legitimacy of each transaction. Neither function may override the other's approval without written consent from the Managing Director (MD).

13. Due Diligence and Third-Party Management

13.1 Objective

To ensure that all third parties acting on behalf of Stravica uphold equivalent anti-bribery standards and pose no undue ethical or reputational risk.

13.2 Pre-Engagement Screening

Before contracting, Procurement and Compliance must verify:

- Legal identity and beneficial ownership.
- Financial stability and solvency.
- Prior sanctions, enforcement actions, or adverse media.
- Existence of anti-bribery policies and training.
- References from at least one previous public-sector client, where possible.

13.3 Risk Rating

Each supplier or agent is scored Low, Medium, or High risk based on geography, contract value, sector exposure, and public-official interactions.

High-risk entities require enhanced due diligence including independent verification, site visits, and compliance questionnaires (Appendix D).

13.4 Contractual Safeguards

All contracts must include:

- a) An anti-bribery clause referencing the Bribery Act 2010 and Stravica's zero-tolerance stance.
- b) Rights of audit, inspection, and immediate termination for non-compliance.
- c) Obligations to report suspected breaches within 24 hours.

13.5 Ongoing Monitoring

Procurement and Compliance review supplier performance annually. Any

supplier failing to meet ethical or audit standards will be subject to corrective action or removal from the Approved Supplier List.

13.6 Mergers, Acquisitions & Joint Ventures

Prior to entering new ventures, Stravica conducts comprehensive bribery-risk assessments and requires alignment of ABMS controls within six months of contract signature.

14. Reporting, Whistleblowing & Investigations

14.1 Objective

To provide safe, confidential channels for raising bribery or corruption concerns without fear of retaliation.

14.2 Reporting Channels

Concerns can be raised via:

- a) Line Manager or Supervisor;
- b) Head of Governance & Compliance (HGC) at compliance@stravica.uk
- c) Anonymous webform on www.stravica.uk/report

14.3 Anonymity & Confidentiality

Reports may be submitted anonymously. All reports are logged in the Integrity Incident Register and handled confidentially under the Whistleblowing Policy.

14.4 Investigation Process

- a) HGC acknowledges receipt within 2 working days.
- b) Preliminary triage determines risk level and assigns an investigator.
- c) Interviews, evidence collection, and document reviews conducted under the Investigation Protocol (Appendix E).
- d) Findings are summarised in a Case Report reviewed by the Integrity & Compliance Committee.
- e) Confirmed breaches trigger disciplinary or contractual action and, where necessary, self-reporting to the Serious Fraud Office (SFO) or Crown Commercial Service.

14.5 Protection for Whistleblowers

Stravica strictly prohibits retaliation. Anyone who raises a concern in good faith will be protected even if it proves unfounded. Detrimental treatment (dismissal, demotion, harassment) will be treated as gross misconduct.

14.6 Malicious Reports

Knowingly false or malicious reports are themselves a disciplinary offence.

15. Training, Communication & Certification

15.1 Purpose

To ensure that all personnel and business partners understand bribery risks and Stravica's obligations under law.

15.2 Training Programme

- a) Induction Training: All new employees complete anti-bribery training within 30 days of joining.
- b) Annual Refresher Training: Mandatory e-learning for all staff.
- c) Role-Specific Workshops: For Procurement, Finance, and Project Managers.
- d) Third-Party Briefings: Contractors and agents receive compliance toolkits as part of onboarding.

15.3 Certification & Declarations

- a) Each employee signs an Annual Integrity Declaration confirming understanding of and adherence to this policy.
- b) High-risk suppliers must provide a signed Supplier Integrity Commitment (Appendix F).
- c) Records of completion retained for a minimum of six years.

15.4 Communication

- Policy published on the corporate intranet and website.
- Annual communication from the MD reinforcing zero tolerance.
- Periodic newsletters highlighting real case studies and lessons learned.

15.5 Evaluation of Effectiveness

Training metrics (completion %, assessment scores, feedback) reviewed

quarterly by HGC and presented to the Board. Non-compliance triggers targeted retraining or disciplinary review.

16. Monitoring, Audit and Continuous Improvement

16.1 Purpose

To ensure Stravica Ltd's anti-bribery controls remain effective, proportionate, and continuously improved in line with legislative and contractual requirements.

16.2 Compliance Monitoring

- a) The Head of Governance & Compliance (HGC) conducts quarterly compliance reviews covering:
 - Register updates (G&H, conflicts, donations);
 - Training completion rates;
 - Incident reports and investigation outcomes;
 - Corrective actions and status tracking.
- b) Results are reported to the Integrity & Compliance Committee and the Board Audit Panel.

16.3 Internal Audits

- a) Independent audits performed at least annually to verify policy implementation across finance, procurement and project operations.
- b) Audit reports classify findings as Conformity, Observation, Minor Non-conformance or Major Non-conformance.
- c) Corrective actions must be closed within 30 days (Minor) or 10 days (Major).
- d) Audit results inform management reviews and training updates.

16.4 External Audits and Client Assurance

Stravica welcomes audit visits from clients or regulators (e.g. Crown Commercial Service, SFO) and commits to full co-operation and transparency.

16.5 Management Review

- a) Held annually by the Board to evaluate:
 - Overall effectiveness of the Anti-Bribery Management System (ABMS);
 - Risk register updates and emerging threats;
 - Audit outcomes, KPIs, and resources;

- Corrective and preventive actions;
- Recommendations for improvement.

b) Minutes and decisions are retained as formal records for six years.

16.6 Key Performance Indicators (KPIs)

KPI Area	Metric	Target	Review Frequency
Training	% staff completing annual training	100 %	Quarterly
G&H Register	Entries reviewed and approved	100 %	Quarterly
Incidents	Reports investigated within 10 days	≥ 95 %	Quarterly
Suppliers	Due diligence renewed	100 %	Annually
Audit Findings	Corrective actions closed on time	≥ 95 %	Quarterly

16.7 Continuous Improvement Cycle

Plan → Do → Check → Act (ISO 37001 model) applied to all compliance activities.

Improvements drawn from incident reviews, staff feedback and external benchmarking.

17. Sanctions and Disciplinary Measures

17.1 Internal Employees

Confirmed breaches of this policy constitute gross misconduct and may lead to dismissal.

Where criminal activity is suspected, the matter will be reported to law enforcement agencies.

17.2 Suppliers and Contractors

Contracts include right of termination for breach and recovery of losses incurred by Stravica.

Serious breaches may result in referral to Crown Commercial Service and exclusion from future procurement frameworks.

17.3 Directors and Officers

Any director found in violation may be removed from office under the Companies Act 2006 and reported to the Registrar of Companies.

17.4 Rehabilitation and Corrective Action

Where breaches are minor or due to negligence rather than intent, corrective training and enhanced supervision may be used in lieu of disciplinary sanction.

18. Policy Communication and Accessibility

18.1 The policy is distributed to all employees and contractors upon issue and published on the Stravica intranet and website.

18.2 Updates are communicated through email alerts and toolbox talks within 10 working days of revision.

18.3 A summary statement appears in staff handbooks and supplier onboarding packs.

19. Appendices

Appendix A – Gift & Hospitality Register Template

Date	Recipient/Donor	Organisation	Description	Value	Purpose	Approved By	Entered By

Appendix B – Conflict of Interest Declaration Form

Sections for: employee details, nature of conflict, related parties, mitigation actions, manager sign-off, and HGC approval.

Appendix C – Facilitation Payment Report Form

Fields: incident date/time, location, amount, reason, receipt availability, risk to safety, reported to whom, follow-up action.

Appendix D – Third-Party Due Diligence Checklist

Covers identity verification, sanctions screening, ownership structure, reputation review, AB&C policy existence, and approval status.

Appendix E – Investigation Flowchart

1. Incident reported → 2. Log created by HGC → 3. Preliminary assessment → 4. Full investigation (if substantiated) → 5. Report & recommendations → 6. Committee review → 7. Closure & lessons learned.

Appendix F – Supplier Integrity Commitment

Formal statement for signature by suppliers confirming compliance with the Bribery Act 2010 and Stravica's policy.

Appendix G – Training Completion Record

Matrix listing employee name, role, training date, module type (induction/refresher/advanced), score, signature.

Appendix H – Annual Management Review Agenda

1. Policy effectiveness review.
2. Audit findings and trend analysis.
3. Training compliance rates.
4. Supplier and third-party performance.
5. Risk register update.
6. Improvement actions and targets.

20. Approval and Version Control

Field	Detail
Document Title	Anti-Bribery & Corruption Policy
Version	1.0
Date Issued	23 October 2025
Next Review	23 October 2027
Approved By	Managing Director, Stravica Ltd
Responsible Officer	Head of Governance & Compliance
Distribution	All employees, subcontractors and suppliers
Public Availability	www.stravica.uk