
Anti-Bribery & Corruption Policy

Policy Statement

Ascent Fire is committed to conducting all business activities with integrity, transparency, and in compliance with the UK Bribery Act 2010 and all applicable anti-corruption legislation.

We operate a zero-tolerance approach to bribery and corruption and are committed to implementing effective systems and controls to prevent, detect, and respond to such practices.

Scope

This policy applies to all employees, directors, contractors, consultants, agency staff, and any third parties acting on behalf of Ascent Fire.

It covers all business dealings and transactions, including interactions with customers, suppliers, contractors, and public officials.

Prohibited Conduct

Bribery includes offering, giving, receiving, or soliciting any advantage intended to influence behaviour or gain an improper business benefit.

Ascent Fire strictly prohibits:

- Offering or accepting bribes in any form, directly or indirectly
 - Making or receiving facilitation payments (except in exceptional circumstances involving personal safety)
 - Improper gifts, hospitality, or incentives intended to influence decisions
 - Any activity that could be perceived as unethical or in breach of trust
-

Ascent Fire Ltd

Gifts and Hospitality

Employees must:

- Ensure any gifts or hospitality are reasonable, proportionate, and for legitimate business purposes
- Not offer or accept cash or cash equivalents
- Not offer gifts or hospitality to public officials without appropriate approval
- Declare all gifts and hospitality in accordance with company procedures

Where appropriate, gifts may be declined or, if accepted, recorded and managed transparently (e.g. donated to charity).

Facilitation Payments

Facilitation payments are prohibited. However, if a payment is made under duress or to protect personal safety:

- The payment must be kept to a minimum
 - The incident must be recorded
 - The matter must be reported immediately to management
-

Responsibilities

All employees are responsible for:

- Reading, understanding, and complying with this policy
- Avoiding any activity that could lead to or suggest bribery or corruption
- Reporting any concerns or suspected breaches immediately

Management is responsible for ensuring that employees are aware of and adhere to this policy.

Reporting Concerns

Employees are encouraged to raise concerns at the earliest opportunity through their line manager or designated contact.

Reports will be treated confidentially, and no employee will suffer detriment for raising genuine concerns in good faith.

Ascent Fire Ltd

Record Keeping

Ascent Fire will maintain accurate financial and business records to ensure transparency, including:

- Recording all gifts and hospitality
- Maintaining clear and accurate accounts
- Ensuring no off-the-record transactions or hidden payments

All expenses must be properly documented and justified.

Training and Communication

- Employees will receive training on anti-bribery and corruption as part of induction and ongoing development.
 - This policy will be communicated to suppliers, contractors, and business partners.
-

Compliance and Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including dismissal, and may lead to legal action where appropriate.

Monitoring and Review

This policy will be regularly reviewed and audited to ensure its effectiveness and compliance with legal and regulatory requirements. Improvements will be implemented where necessary.

Signature: *Brian Pickering*
Position: Director
Date: 01/04/2026
Review Date: 31/03/2027