

Anti Bribery and Corruption Policy

This policy outlines how GM Floor Screeds conducts its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever GM Floor Screeds operates.

Failure to comply with this policy may constitute a serious act of misconduct which could result in the dismissal of an employee/worker or the cancellation of a contract with a business/associated person.

We will uphold all laws relevant to countering bribery and corruption, including the Bribery Act 2010. It is a criminal offence for an individual to offer or accept a bribe and is punishable by a fine and/or up to 10 years imprisonment. The Act also states that an offence will be committed by a commercial organisation if they fail to prevent a person associated with the organisation from offering or accepting a bribe which would obtain or retain business for the said organisation or cause the organisation to gain an advantage in the conduct of its business.

An associated person is a director, employee, shareholder, contractors, agency worker, sub-contractor, supplier, distributor and any other third party acting in association with the organisation. Where an organisation is found guilty of any offence this can be punishable by an unlimited fine and/or the loss of the right to tender for government contracts and face damage to its reputation.

Bribery may be known as a bung, kickback, favour for cash or other terminology. It is generally defined as the giving or receiving of a financial inducement or other advantages in return for the improper performance of a relevant function or activity.

Bribery could include giving or receiving a financial inducement to secure or keep a contract or order. This could be to gain an advantage over a competitor, falsify inspections/report or to obtain a certificate. It could be where a company will turn blind eye to health and safety issues or poor performance. Including the substitution of materials, false labour charges and also including the offering of gifts, hospitality, entertainment, or other benefits.

Bribes can be given to, or received from suppliers, contractors, public officials, and clients. To ensure compliance with the Act and general principles of honesty, integrity, and commercial fairness GM Floor Screeds Ltd has adopted the policy to prevent the commission of acts of bribery in its name.

Therefore GM Floor Screeds follow a prohibited conduct to ensure this policy is not broken.

Prohibited conduct meaning:

- Making unofficial payments to officials to obtain any permission, permit or stamp.
- Making payments or giving incentives to obtain or retain business.
- Accepting payments or receiving incentives in return for accepting a tender for business.
- Making or receiving a facilitation payment to expedite the performance of a routine procedure or function.

The above conduct is prohibited, regardless of the location anywhere in the world. The policy applies to all individuals as said by associated persons or third parties.

The policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded. Normal hospitality - to thank an existing client or supplier for loyalty. Appropriate gifts at Christmas time, given openly. It does not include cash or cash equivalent [voucher] and is an appropriate type of gift and of value as a thank you.

Where a person acting on behalf of the business is considering entering into an agreement with a new supplier, agent, or partner then they should consider whether the person or organisation is likely to be involved in corrupt or unlawful practices that may be in contravention of the Bribery Act 2010. Where it is considered that there is a risk of bribery arising from entering into an agreement with a new supplier or organisation then due diligence should be carried out. This may involve obtaining information on any anti-bribery policies the said person or organisation has in place, obtaining third party references for the supplier, agent or partners and obtaining criminal record checks for relevant individuals.

Any person associated with the business who suspects or has concerns that any person, or organisation engaged in business or association with GM Floor Screed Ltd is involved in bribery should report this through the whistleblowing policy or through the appropriate manager. All reports will be taken seriously and dealt with promptly and where possible in confidence. Any person reporting suspected bribery should be able to do so without reprisal and no disciplinary or otherwise detrimental action will be taken against a person for reporting a suspected act of bribery unless they did so in bad faith.

It is a person's responsibility to ensure they read and understand and comply with this policy.

GM Floor Screeds Ltd

Reviewed/amended on 15/11/23

Due for review on 14/11/24

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Name	Department	Signature	Date