



**STONE & CERAMIC**



# **Bribery & Corruption Policy**

**2024**

## Introduction

Stone & Ceramic Ltd is one of London's leading specialist sub-contractors providing tiling and stonework services to the construction industry. We have a zero-tolerance policy towards bribery or corruption within our business. We promote the idea of free and fair competition; we do not want our business successes to be tainted by bribery. As such the Company is clear on its policy in relation to bribery & corruption and we support our employees to make decisions in line with our stated position.

## Business Integrity

We will ensure integrity in all our business transactions. We will be open, honest & fair in our communications and our dealings with business partners and other stakeholders affected by our activities and where necessary that of our supply chain. The company operate strict codes of conduct with regard to acceptance of bribery or gifts made in the in the course of our business.

## Policy

Our Company business principles set out our commitment to operate responsibly where we work and to engage the social, environmental & ethical impact our activities in the market in which we operate.

Stone & Ceramic Ltd do not engage in bribery or any form of unethical inducement or payment including facilitation payments and kickbacks. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of the Company. Employees must declare and keep a record of hospitality of gifts accepted or offered which will be subject to managerial review. We do not make direct or indirect contributions to political parties.

We will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate particularly laws that are directly relevant to specific business practices.

## Bribery and Corruption Definitions

**Bribery** is a form of corruption. It happens when one person gives another person a reward or inducement for acting improperly, illegally or unethically to gain an advantage, whether personal, commercial or regulatory. You do not need to actually give or receive the reward or inducement for this to amount to bribery. A bribe does not need to involve money. Offering hospitality, entertainment or gifts can also be classed as bribery if the purpose is to exert influence.

**Corruption** is dishonest, illegal or fraudulent conduct by persons in a position of power.

**Examples of behaviour** which may amount to bribery include:

- a Promising, offering or giving money, hospitality or gifts in the expectation of receiving a business advantage, or because you have already received that advantage
- b Accepting or giving hospitality or gifts in the course of commercial negotiations of any kind, including tender processes, if there is any uncertainty about whether doing so could have an impact on the outcome
- c Accepting money, gifts or hospitality from anyone you suspect is seeking a business advantage in return

# Anti-Bribery & Corruption Policy

## The Bribery Act

The *Bribery Act 2010* sets out legal obligations placed on individuals and businesses to prevent bribery and corruption. It contains the following offences:

- a Giving or offering a bribe
- b Receiving or requesting a bribe
- c Bribing a foreign public official
- d Liability for businesses who fail to prevent persons associated with them from bribing another person on their behalf

## Responsibilities and Obligations

The Board of Directors shall establish appropriate responsibilities and procedures. If any instance of bribery or corruption is identified, Stone & Ceramic Ltd will take remedial steps immediately. We commit to the following:-

- We will undertake risk assessments to review the risks of bribery in each key area of our business and will review such assessments regularly.
- We will make sure that all levels of management are trained and understand with our approach to bribery and corruption issues.
- We will undertake due diligence when considering potential business partners and new business areas in order to assess the level of bribery and corruption risk involved.
- We will act swiftly and decisively in the event that any breach or potential breach of this Policy is brought to our attention.
- We will put in place clear approvals procedures for business expenses, hospitality and gifts.
- We will appoint a designated Lead for anti bribery and corruption

You have a clear responsibility to act honestly and with integrity in your work for us. In order help us to create a business which is free from bribery you must:

- Complete the mandatory on line training course on anti bribery and corruption
- Keep full records and receipts of any and all gifts or hospitality given or received or payments made to any third parties in connection with your work and provide copies to us on request.
- Read and understand this Policy and complete any training associated with it.
- Tell your manager or the designated lead about any activity of colleagues which comes to your attention which you think may be in breach of this Policy as soon as possible.
- Report any approach to offer you a bribe, facilitation payment, kickback or other incentive for the provision of services on our behalf, by informing your line manager, a Director or the designated lead.

## Normal hospitality, gifts and entertaining

Hospitality, gifts and entertainment form an important part of any business's development strategy. Giving and receiving hospitality or gifts will not, in and of itself, amount to bribery. However, expenditure needs to be reasonable and proportionate. You need to be mindful of the level of hospitality being provided or offered and the timing of any hospitality in the context of any key business decisions or investments. Offering hospitality and entertainment to or receiving them from third parties is allowed under this Policy, provided they are appropriate and reasonable in the circumstances. If you are uncertain in any circumstance you must check with your line manager.

# Anti-Bribery & Corruption Policy

## Training & Communications

We will communicate this policy and relevant guidance to employees across the Company, through our established communication channels. We will also communicate this policy to our suppliers and contractors. All Managers and employees are required to complete the online training course on anti bribery and corruption and understand the policy's relevance in their scope of activity for the Company.

## Designated Lead and Reporting

Courtney Asser, Business Improvement Manager 07521767232 is the company's designated Lead for anti bribery and corruption and is the person you should report any concerns, any breaches or go to if you have any queries. Courtney Asser is responsible for monitoring this policy, maintaining its inclusion on the risk register, undertaking regular audits and reporting to the management board on a quarterly basis.

## Breaches of the Policy

Any employee who breaches this Policy may face disciplinary action, which could result in dismissal for gross misconduct. We may terminate our contractual relationship with others who provide services to us and are covered by this Policy if they breach it.

## Monitoring & Review

Stone & Ceramic Ltd will review this policy a minimum of annually as part of the Management Review process in order to ensure its ongoing relevance, effectiveness and adequacy in line with any updates to legislation and / or customer requirements.



**Robert Hansford – Director**

**Date: 20<sup>th</sup> June 2023**