

Name of Policy: Anti-bribery and Corruption Statement

Reference: ABC

1.	Introduction
1.1	BGS Utilities values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the company's staff as well as others acting on the firm's behalf are key to maintaining these standards.
1.2	This statement sets out the company's position in relation to fraud, bribery and corruption and provides guidelines aimed at ensuring compliance with the law, encouraging vigilance and provides a means for reporting potential issues. This statement applies to all staff/employees, directors, agents, sub-contractors, suppliers, agency workers and any other people that are associated with BGS Utilities. This statement exists to set out the responsibilities of BGS Utilities and those who work for us in regard to observing and upholding our zero-tolerance position on fraud, bribery and corruption. It also exists to act as a source of information and guidance for those working for BGS Utilities. It helps them to recognise and deal with bribery and corruption issues, as well as understand their responsibilities.
2.	Commitment
2.1	BGS Utilities is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented.
2.2	BGS Utilities has zero-tolerance for bribery, fraud and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.
2.3	BGS Utilities will constantly uphold all laws relating to anti-bribery, fraud and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct.
3.	Legal obligations
3.1	BGS Utilities recognises that bribery, fraud and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.
3.2	This statement applies to all employees (whether temporary, fixed-term, or permanent), consultants, sub-contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The statement also applies to Officers, Trustees, Board, and/or Committee members at any level.
3.3	In the context of this statement, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies -this includes their advisors, representatives and officials, politicians, and public parties.
3.4	Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4.	Definition of bribery
4.1	Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
4.2	A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
4.3	Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
4.4	Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's Operations Manager.
5.	What IS and what is NOT acceptable
5.1	Gifts and hospitality -BGS Utilities accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements: • It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits • It is not made with the suggestion that a return favour is expected • It is in compliance with local law • It is given in the name of the company, not in an individual's name • It does not include cash or a cash equivalent (e.g. a voucher or gift certificate) • It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion) • It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift. The Anti-Bribery & Anti-Corruption Statement is fully supported by Senior Management.
6.	Bribery Act 2010
6.1	This Statement is based on the Bribery Act 2010. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. In the UK it is an offence to: • Offer, promise or give a financial or other advantage to another person whether in the UK or abroad, with the intention of inducing or rewarding improper conduct. • Request, agree to receive or accept a financial or other advantage for or in improper conduct. You can be held personally liable for any such offence.
6.2	It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons.
6.3	All employees and associated persons are required to: • Comply with any anti bribery and ant corruption laws • Act honestly, responsibly and with integrity • uphold the Company's values in an ethical, professional and lawful manner at all times.

6.4	Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the facilitating the payment or receipt of a bribe.
6.5	The Company recognises that industry practices may vary from country to country, or from culture to culture. What is considered normal practice in one place may be considered unacceptable in another. Nevertheless, a strict adherence to the guide lines set out in this Statement is expected of all employees and associated persons at all times. If in doubt as to what might amount to a bribe or what might constitute a breach of this statement, refer the matter to a director of the Company.
7.	Gifts and hospitality
7.1	The Anti-Bribery Act does not attempt to outlaw legitimate corporate hospitality by which Companies may get to know their clients and this hospitality is not prohibited. If there is any doubt over what constitutes corporate hospitality then seek direction from a director of the Company.
7.2	The giving or receiving of gifts to or from clients, customers, contractors and suppliers is not prohibited provided the following guide lines are met; • The gift is not made with the intention of influencing a third party to obtain or retain business or gain an advantage, or to reward the provision of retention of business or a business advantage. • It is given or received in our name not your name • It complies with local law • It does not include cash or a cash equivalent (e.g. gift vouchers) • It is appropriate and reasonable • It is given or received openly, not secretly
7.3	In summary, it is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received. It is also not acceptable to reward a business advantage already given, or accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will gain a business advantage for them.
8.	Record keeping
8.1	All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off the record' to facilitate or conceal improper payments.
9.	Monitoring and reporting
9.1	The prevention, detection and reporting of bribery or corruption is the responsibility of all employees throughout the firm. If you become aware or suspect that an activity or conduct is proposed or has taken place is a bribe or corrupt, then you have a duty to report this.
9.2	Any such incident should be reported to a director of the Company. Anyone who raises a concern or reports a situation will receive full support from the Company.
10.	Statement of breach
10.1	A breach of any of the provisions of this Statement will constitute a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure. As far as associated people are concerned, a breach of this statement could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.



Reference	ABC	Date reviewed	Jan 2025	Date of next review	Jan 2028	Reviewed by	Jonathan Hopkins
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Version	Date	Author	Description
1	Jan 2022	Bill Jones	Approved by Jonathan Hopkins
2	Jan 2025	Bill Jones	Approved by Jonathan Hopkins