

# Anti-Bribery & Corruption Policy

**Conson FM Consulting Limited**

## Policy Statement

Conson FM Consulting Limited is committed to conducting business with honesty, integrity, and fairness. We have a zero-tolerance approach to bribery and corruption and expect all employees, contractors, and associated parties to uphold the highest ethical standards in every business interaction.

We comply fully with UK law, including the Bribery Act 2010, and extend this commitment to all operations, both domestic and international. This policy provides guidance on recognizing, preventing, and reporting bribery or corrupt practices.

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## Who This Policy Applies To

This policy applies to everyone working for or on behalf of Conson FM Consulting Limited, including employees, contractors, consultants, agency staff, trainees, and anyone representing the company. All individuals are expected to comply with this policy at all times.

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## Understanding Bribery

A bribe is any offer, promise, or provision of a benefit intended to influence a person to gain a business, personal, or financial advantage. Examples include:

- Offering gifts or payments to secure business unfairly.
- Accepting inducements in exchange for preferential treatment.
- Making unofficial payments to government officials to expedite services.

All forms of bribery, including payments, gifts, or favors that seek to influence decisions, are strictly prohibited.

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## Gifts, Hospitality, and Donations

- Modest, customary hospitality or gifts may be acceptable if they are reasonable, transparent, and not intended to secure an unfair advantage.

- Gifts, hospitality, or charitable donations require prior approval from the company's designated officer.
  - Cash or cash equivalents are never acceptable.
  - All gifts and hospitality must be recorded accurately for review.
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## **Unacceptable Conduct**

Employees must never:

- Offer, give, request, or accept any bribe or facilitation payment.
- Use gifts, hospitality, or payments to gain or reward a business advantage.
- Retaliate against anyone refusing to participate in bribery or reporting concerns.
- Engage in activities that could suggest or lead to corrupt practices.

Facilitation payments or kickbacks are strictly forbidden under any circumstances.

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## **Responsibilities of Employees**

- Understand and follow this policy at all times.
- Avoid situations that could lead to bribery or the appearance of bribery.
- Report any suspicions or incidents promptly to a line manager or designated officer.
- Maintain accurate records of all gifts, hospitality, and business transactions.

Failure to comply with this policy may result in disciplinary action, including dismissal, and could result in termination of contracts with external parties.

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## **Raising Concerns and Protection**

- Employees are encouraged to report concerns immediately if they suspect bribery or corruption.
  - Individuals raising concerns in good faith will be protected from retaliation, dismissal, or any form of detrimental treatment.
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## **Training and Communication**

- All new employees receive induction training on anti-bribery and corruption measures.
  - Existing employees receive regular refresher training to ensure understanding and compliance.
  - Suppliers, contractors, and partners are informed of our zero-tolerance approach and expected to adhere to the same standards.
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## **Monitoring and Review**

- Management is responsible for ensuring this policy is implemented effectively and remains up to date.
  - Regular audits, reviews, and monitoring processes will be conducted to evaluate compliance and effectiveness.
  - Employees are encouraged to provide feedback or suggestions to improve the policy.
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## **Red Flags**

Employees must remain vigilant and report any suspicious situations, such as:

- Requests for unusual payments, cash transactions, or side agreements.
  - Unexpected or excessive gifts, hospitality, or favors from third parties.
  - Pressure to use unknown agents, intermediaries, or suppliers.
  - Requests for preferential treatment in return for gifts, donations, or services.
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## **Review and Communication**

This Quality Policy is reviewed at least annually to ensure it remains relevant and effective. It is communicated to all employees and made available to clients and other interested parties.

**Signed:**

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A handwritten signature in black ink, appearing to be "David Woodford", written over a horizontal line.

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David Woodford  
Owner

**Date: 10<sup>th</sup> October 2025**