

## **Anti Bribery and Corruption Policy**

### **Foreword**

Cleaning and Support Services vision is “to be the most highly respected company in the cleaning industry”. To achieve this vision we have to build, maintain, protect and enhance our reputation among our stakeholders, including employees, customers and supply chain partners, as well as among the community at large.

A good reputation is a hard won asset which we must protect. Our ability to tender for new business and our relationship with the full range of our stakeholders depends a great deal upon the good reputation that we have established. This means all of us acting to the highest personal, ethical and corporate standards in everything we do. It means making sure all our actions and decisions support CASS’s vision and values.

This policy is designed to help you understand not just the legislation relevant to bribery and corruption but also to provide you with details of further help and training which you may need. I encourage you to seek further guidance or assistance if feel you need it in any way. Your personal contribution to protecting and enhancing our reputation by complying with this policy is important to the CASS board. It is only by each one of us individually being aware of the law and complying with it that we can be sure we protect and enhance the reputation of CASS.

I am committed to this policy and would ask you to show your commitment too by reading it and, if you have any queries or concerns at all, getting in touch as set out at the end of the policy.



Grahame Chapman, Managing Director

July 2018

## **Introduction**

Our vision is “to be the most highly respected company in the industry”, and our success in this endeavour is dependent upon how all employees behave. Our core values demand us to be enthusiastic, open and honest and to be proactive, committed and safe. It is also our policy to comply with the law wherever we operate.

It is a criminal offence to offer, promise or provide – or request or accept - a bribe, it is also an offence for a commercial organisation to fail to prevent an incident of bribery committed either by the company or by someone associated with it in order to obtain or retain a business advantage. This means that bribery and corruption has absolutely no place within Cleaning and Support Services and that is why we operate a strict no tolerance policy towards bribery in all its forms whether directly or through third parties.

This anti-bribery and corruption policy applies to all members of Cleaning and Support Services full and part-time employees and temporary staff. We also rely on the services of contractors, sub-contractors and consultants, and here we want to do business only those who accept the terms of our policy or whose own policy sets standards to match our own.

This policy sets out our anti-bribery and corruption rules and explains what is expected of you, but we ask you to do more than follow rules. We want you to act according to the spirit and the values they represent in whatever you do for the CASS.

## **Understanding and recognising bribery and corruption**

Bribery and corruption can occur in many forms; so understanding them and recognising when they might occur is a key step in guarding against them.

Bribery is when a person offers, promises or gives a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act improperly.

Corruption is any form of illegal, dishonest or bad behaviour, especially by people in positions of power. Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a business decision.

Transparency and openness are effective weapons against bribery, so be ready to challenge any arrangements that compromise them. Even political contributions, charitable donations and sponsorship arrangements can be used as a subterfuge for bribery.

## **Penalties for engaging in bribery and corruption**

As befits a serious criminal offence, the penalties for engaging in bribery or corruption are severe. Individuals and companies can face punitive fines and even imprisonment. New legislation incorporates a specific criminal offence of a company failing to prevent bribery committed on its behalf.

We take this responsibility very seriously and this is why we want to be associated only with others whose standards match our own. A conviction for a bribery or corruption related offence would have severe penalties for our reputation.

## Preventing bribery

Cleaning and Support Services's 'no tolerance' of bribery relies on each one of us choosing to always do the right thing. All this takes is a few simple commitments:

We will always:

- Comply with this Anti-Bribery and Corruption Policy
- Act accordingly
- Be guided by our vision and values of openness and honesty
- Comply with company policies on gifts and hospitality; political contributions and charitable donations
- Comply with our requirements concerning any conflicts of interest
- Record all activities and transactions accurately, completely and transparently
- Follow appropriate due diligence and risk mitigation procedures before proceeding with any contract or other arrangement
- Seek advice if unsure how to proceed
- Report any suspected or actual breaches of this policy promptly and accurately to a Director.

We will never:

- Participate in any form of corrupt behaviour
- Use company funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose
- Authorise, make, tolerate or encourage, or invite or accept, any improper payments to obtain, retain or improve business
- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Offer or give anything of value to a public official (or their representative) to induce or reward them for acting improperly in the course of their public responsibilities
- Offer or accept gifts or hospitality, if we think this might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk it could be misconstrued or misinterpreted by others.

## Understanding specific areas of risk

While high profile cases of bribery, involving large sums of cash and senior executives, are most likely to hit the headlines, bribery can be a risk in many areas

- Facilitation payments
- Kickbacks and reciprocal agreements
- False claims
- Corrupt third parties (including agents, consultants, contractors or subcontractors)
- Excessive gifts and hospitality
- Inadequate financial controls or record keeping.

Facilitation payments are usually small payments (or gifts) made to public officials in order to speed up or 'facilitate' actions the officials are already duty-bound to perform. We make no distinction between facilitation payments and bribes, regardless of their size or the local culture.

Kickbacks and reciprocal agreements or any other form of 'quid pro quo' are never acceptable. We will not participate in cartels, cover pricing, bid-rigging or any form of collusion. We will never accept improper payments to obtain new business, retain existing business, or secure any improper advantage. Corrupt third parties can include a range of people acting on our behalf such as agents, consultants, contractors or sub-contractors. We wish to work only with those who are committed to our standards and will undertake due diligence to ensure this. We will engage a third party only when there is a clear business rationale for doing so and with an appropriate contract. We will ensure all payments made to third parties are properly authorised and recorded.

Excessive gifts and hospitality can be used to exert improper influence on decision makers. We will only accept gifts and hospitality in accordance with our policy. We will ensure any gifts or hospitality we offer are reasonable in terms of value and frequency. We will never offer or accept gifts or hospitality if we feel it could influence a business decision or give the appearance of doing so. Inadequate financial controls or record keeping can be exploited to hide bribes or corrupt practices. We will ensure we have robust controls in place so that our financial and other records are accurate and complete and never misleading.

## How to raise a concern

If you have a concern or know of or suspect a violation of this policy we want you to speak up immediately. Please don't ignore it. Speaking up can be a difficult thing to do, so be reassured that all information received will be treated seriously and investigated appropriately.

If you act in good faith, believing your information is accurate, we will protect you even if you are wrong. Doing the right thing will not disadvantage your career or affect your relationships at work and that is why we will not tolerate any form of discrimination or bullying of someone who has spoken up in good faith.

Some concerns can be addressed by speaking to the person whose conduct is a cause for concern. We understand that this is not always possible so we suggest that you speak to your line manager. If, for whatever reason, you don't feel comfortable doing this, you can contact Grahame Chapman. We will treat your information in confidence and if you prefer, and the law allows it, you can report anonymously.

## **Disciplinary action**

Bribery is a criminal offence which can lead to criminal penalties. But in addition, you have a duty to CASS and breaches of this policy will result in prompt disciplinary action, up to and including dismissal.

## **Statement of commitment**

We will not tolerate any form of bribery or corruption.

This policy demonstrates CASS's no-tolerance approach to bribery and corruption. It will be regularly reviewed and updated if necessary as new threats appear.

This policy applies to the whole of Cleaning and Support Services and as such should be seen as setting the broad rules and guidance for all.

## **Legislation**

The Bribery Act reforms the criminal law to provide a new, modern and comprehensive scheme of bribery offences that will enable courts and prosecutors to respond more effectively to bribery.

Specifically it creates:

- Two general offences covering the offering, promising or giving of an advantage, and requesting, agreeing to receive or accepting of an advantage
- A discrete offence of bribery of a foreign public official
- A new offence of failure by a commercial organisation to prevent a bribe being paid for or on its behalf (it will be a defence if the organisation has adequate procedures in place to prevent bribery).

You can find out more via <http://www.justice.gov.uk/publications/bribery-act.htm>