

ANTI-BRIBERY AND CORRUPTION POLICY

Issue Date: 07/ 01 / 2025

Review Date: 07 / 01/ 2026

Approved by: Nancy Mcwilliam – Company Director

1. Policy Statement

M & F Roofing NW Ltd is committed to conducting its business with the highest standards of honesty, integrity, and transparency. We operate a zero-tolerance approach to bribery and corruption, whether direct or indirect, and comply fully with the Bribery Act 2010.

We are committed to acting professionally, fairly, and lawfully in all business dealings and relationships, and to implementing and enforcing effective systems to prevent bribery and corruption.

2. Purpose of this Policy

This policy is designed to:

- Set out our responsibilities in observing and upholding our zero-tolerance position on bribery and corruption.
- Provide information and guidance to employees, contractors, and suppliers on recognising and dealing with bribery and corruption issues.

3. Scope

This policy applies to:

- All employees (permanent, temporary, and agency)
- Directors and officers
- Subcontractors, consultants, and suppliers
- Any third party acting on behalf of M & F Roofing NW Ltd

4. What is Bribery?

Bribery refers to offering, promising, giving, accepting, or seeking anything of value to influence a decision or gain unfair advantage. Examples include:

- Offering cash or gifts to win contracts
- Accepting hospitality in return for preferential treatment
- Making facilitation payments to expedite a service

5. Prohibited Conduct

You must not:

- Offer or accept any bribe, whether cash or other inducement
- Offer or accept excessive gifts, entertainment, or hospitality
- Use company funds or assets for illegal or unethical payments
- Ignore or fail to report suspected bribery

6. Gifts and Hospitality

Reasonable, proportionate gifts and hospitality may be allowed only if:

- They are for genuine business purposes
- They are not intended to influence a business decision
- They are declared and approved in advance

All gifts or hospitality over £50 must be recorded in the Gifts & Hospitality Register.

7. Responsibilities

- The Company Director is responsible for ensuring compliance with this policy.
- All employees and business partners must read, understand, and comply with this policy.
- Anyone who suspects a breach must report it immediately.

8. Reporting Concerns

If you believe or suspect that bribery has occurred, you must report it to:

- Your line manager or supervisor
- The Company Director
- An external authority (e.g. Action Fraud or the Police), if necessary

Reports will be treated confidentially and without fear of retaliation.

9. Consequences of Breach

Any breach of this policy by employees may result in disciplinary action, including dismissal. Breaches by contractors or suppliers may lead to termination of contracts and possible legal action.

10. Review

This policy will be reviewed annually and updated to reflect legal requirements, best practice, and changes in business operations.

Signed:

Nancy McWilliam
Company Director
M & F Roofing NW Ltd