

Anti-Bribery & Corruption Policy

Effective Date: 01 September 2025

Next Review Date: 01 September 2026

1. Purpose

Byrecroft Ltd is committed to conducting its business in an honest, transparent, and ethical manner. We have a zero-tolerance approach to bribery and corruption and are dedicated to ensuring compliance with the UK Bribery Act 2010.

This policy sets out our responsibilities in observing and upholding this commitment and provides guidance to employees, subcontractors, and business partners.

2. Scope

This policy applies to:

- All employees (permanent, temporary, apprentices, and agency staff).
- All subcontractors, consultants, suppliers, and business partners working with or on behalf of Byrecroft Ltd.
- All business dealings in the UK and overseas.

3. Definition of Bribery

Bribery is offering, promising, giving, requesting, or accepting any financial or other advantage as an inducement to act improperly in the performance of a function.

Examples include:

- Offering or receiving cash payments or "kickbacks".
- Inappropriate gifts or hospitality designed to influence decisions.
- Favouritism in awarding contracts or supplier agreements.

4. Policy Statement

- Bribery and corruption in any form are strictly prohibited.
- No employee, director, or representative shall engage in bribery either directly or indirectly.
- We will only engage in transparent, legitimate business practices.
- Hospitality and promotional gifts are acceptable only if they are reasonable, proportionate, and not intended to influence decisions.
- Any breach of this policy will result in disciplinary action and may lead to dismissal or termination of contracts.

5. Responsibilities

- Board of Directors – accountable for ensuring compliance with this policy.
 - All Employees & Representatives – must read, understand, and comply with the policy.
 - Suppliers & Subcontractors – required to uphold the same standards of integrity.
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07790 118824
07561 317660



marlow@byrecroft.com
www.byrecroft.com



1 Station Road, North
Cowton, DL7 0HH

6. Risk Assessment & Due Diligence

We assess potential bribery risks in:

- Procurement of goods and services.
- Engagement of subcontractors and labour agencies.
- Client tendering and bidding processes.

Due diligence checks are carried out before entering into supplier or subcontractor agreements.

7. Gifts & Hospitality

- Must be modest, infrequent, and in line with normal business courtesy.
 - Must never be intended to influence a business decision.
 - Must be recorded in the Gifts & Hospitality Register.
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8. Reporting & Whistleblowing

Employees and partners are encouraged to report any concerns about bribery:

- Internally to the Operations Director or Board of Directors.
- Externally through the Serious Fraud Office (SFO) or relevant authorities.

All concerns will be treated confidentially and without fear of retaliation.

9. Training & Awareness

- Training will be provided to employees on recognising and preventing bribery.
 - Toolbox talks and refresher training will be scheduled annually.
 - Subcontractors will be briefed on expectations during induction or contract engagement.
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10. Monitoring & Review

- Compliance with this policy will be monitored through internal audits and supplier checks.
 - This policy will be reviewed annually and updated if required by changes in legislation or business activity.
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11. Approval

Approved by the Board of Directors Byrecroft Ltd

Date Signed: 02 September 2025



Signed: _____

Name: Marc Thiart

Position: Director