

# Bribery policy



**2nd Floor Hindsford House, Printshop Lane, Atherton, M46 9BJ**

**Tel: 0161 518 4232**

## **1.0 BRIBERY PROCEDURE**

**ASH Integrated Services Ltd** aims to prevent bribery by associated persons through proportionate, clear, practical, accessible and effectively implemented anti-bribery policies and procedures in compliance with the **Bribery Act 2010**.

The top-level management of **ASH Integrated Services Ltd** are committed to preventing bribery by persons associated with it. **ASH Integrated Services Ltd** foster a culture within our company in which bribery is never acceptable.

### **1.1 Internal and external communication of the commitment to zero tolerance to bribery**

**ASH Integrated Services Ltd** is committed to carrying out business fairly, honestly and openly and will adhere to the following;

- Fully assisting law enforcement in prosecuting anyone who commits a bribery offence.
- Avoiding doing business with people who do not openly commit to doing business without bribery.
- Openly articulating the benefits of doing business without bribery, and the range of bribery prevention procedures that **ASH Integrated Services Ltd** follows.
- The **ASH Integrated Services Ltd** has key individuals who ensure that there is development and implementation of the anti-bribery procedures across the company.

**ASH Integrated Services Ltd** assesses the nature and extent of its exposure to potential external and internal risks of bribery on its behalf by persons associated with it. The assessment is periodic, informed and documented.

**ASH Integrated Services Ltd** applies due diligence procedures, taking a proportionate and risk-based approach, in respect of people who perform or will perform services for or on behalf of **ASH Integrated Services Ltd** in order to mitigate identified bribery risks.

### **1.2 Appraisal and continued monitoring of recruited or engaged 'associated' people may also be required, proportionate to the identified risks**

**ASH Integrated Services Ltd** seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the company through internal and external communication. Anyone who performs services for or on behalf of **ASH Integrated Services Ltd** is an associated person under the **Bribery Act** and **ASH Integrated Services Ltd** will communicate their anti-bribery policy and procedures to all parties that fall within this category.

**ASH Integrated Services Ltd** incorporate in its recruitment and human resources procedures an appropriate level of due diligence to mitigate the risks of bribery being undertaken by employees.

The **ASH Integrated Services Ltd** induction given to all new employees will contain concise training on anti-bribery and **ASH Integrated Services Ltd** procedures for dealing with bribery. After the initial induction training **ASH Integrated Services Ltd** will provide effective refresher sessions at appropriate intervals.

**ASH Integrated Services Ltd** monitors and reviews procedures designed to prevent bribery by persons associated with it and make improvements where necessary.

**ASH Integrated Services Ltd** has systems to deter, detect and investigate bribery. The continuous monitor on financial transactions will help to detect unethical transactions and surveys and questionnaires will help **ASH Integrated Services Ltd** to identify the need for refresher training and improvement of anti-bribery policies.

**ASH Integrated Services Ltd** performs formal periodic reviews and reports for top-level management.

**ASH Integrated Services Ltd** engages external verification or assurance of the effectiveness of anti-bribery procedures.

Signed:  **Antony Grace (Managing Director)**

Date: **1<sup>st</sup> June 2024**

Review: **1<sup>st</sup> June 2025**

**2.0 CONFIRMATION OF EMPLOYEE READING THE ANTI-BRIBERY POLICY**

To be completed by **ALL** personnel

I \_\_\_\_\_ (Name in BLOCK CAPITALS)

Confirm that I have read the Company Policy and fully understand the responsibilities that apply to me in the capacity in which I am employed. If I am unable to fulfil those responsibilities in any way, I will inform my manager, or the Managing Director as soon as is reasonably practicable.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**PLEASE COMPLETE THIS PAGE AND RETURN IT TO HEAD OFFICE.**