



Specialists in Security & Facilities Management

Bribery Act Policy

1. Policy Statement

SFM (UK) Ltd has a zero-tolerance approach to bribery and corruption. We do not, and will not, offer, pay, solicit, or accept bribes or improper inducements, whether directly or indirectly, in any form. This applies to all employees, contractors, agents, suppliers, and other associated persons acting on our behalf.

The Company is committed to preventing, detecting, and deterring bribery, maintaining anti-bribery compliance as an ongoing practice rather than a one-off exercise.

2. Scope

This policy applies to:

- All employees (permanent, temporary, or agency staff)
- Contractors and subcontractors
- Consultants, advisors, and agents
- Suppliers and their employees
- Directors, officers, and other associated persons

The policy covers all SFM (UK) Ltd operations globally. Partners, joint ventures, and suppliers are expected to adopt policies consistent with the principles set out herein.

3. Definition of Bribery

Bribery is an inducement or reward offered, promised, or provided to gain personal, commercial, regulatory, or contractual advantage.

It is prohibited to:

- Offer, promise, or provide a bribe to gain a business advantage or reward a business advantage already given.
- Offer or accept a facilitation payment to a public official to expedite routine procedures.
- Accept a gift, payment, or hospitality from a third party that is intended to secure a business advantage.
- Retaliate or threaten anyone who refuses to participate in bribery or who raises a concern under this policy.
- Engage in any activity that breaches this policy.

4. Objectives

This policy provides a coherent and consistent framework to:

- Enable employees and associated persons to understand and comply with anti-bribery obligations.
- Prevent bribery and corruption across all operations.
- Encourage reporting of potential or actual breaches in a safe and confidential manner.
- Demonstrate the Company's commitment to compliance with the Bribery Act 2010.

5. Facilitation Payments

Facilitation payments are strictly prohibited. These are unofficial payments made to government officials or agents to expedite routine tasks. Such payments are illegal under UK law.

6. Gifts and Hospitality

Modest, promotional gifts (e.g., pens, diaries) may be accepted or offered only if they do not constitute an inducement or reward. Any other gifts or hospitality must be approved by a line manager and recorded.

7. Staff Responsibilities

All staff must:

- Read, understand, and comply with this policy.
- Act with integrity and honesty at all times.
- Raise concerns immediately if they suspect bribery or corruption.
- Avoid any activity that could contravene this policy.

Breaches may result in disciplinary action, including summary dismissal, in addition to civil or criminal liability.

8. Reporting Concerns

SFM (UK) Ltd encourages staff to report concerns promptly. Reports can be made:

- To your line manager
- To a Director
- Through the Whistleblower Policy channels

Concerns may be reported anonymously, although providing identity facilitates investigation. Individuals who report in good faith are protected from retaliation, victimisation, or detriment.

9. Corporate Commitment

SFM (UK) Ltd is committed to:

- Maintaining a clear, up-to-date anti-bribery policy.
- Providing training to all employees and associated persons.
- Encouraging vigilance and reporting of suspected bribery.
- Investigating all allegations rigorously and cooperating with authorities.
- Including anti-bribery clauses in contracts and agreements.

10. Legal Framework – Bribery Act 2010

Key offences include:

- **Section 1:** Bribery of another person
- **Section 2:** Receiving a bribe
- **Section 6:** Bribing a foreign public official
- **Section 7:** Corporate failure to prevent bribery

Penalties for individuals include:

- Magistrates' court: up to 12 months imprisonment or a fine up to £5,000
- Crown Court: up to 10 years imprisonment or unlimited fine

Companies may face unlimited fines for failing to prevent bribery.

11. Adequate Procedures

SFM (UK) Ltd applies the six principles recommended by the Ministry of Justice for anti-bribery procedures:

1. **Proportionate Procedures** – Controls are proportionate to the bribery risks and nature of operations.
2. **Top-Level Commitment** – Senior management demonstrates leadership and fosters a culture where bribery is unacceptable.
3. **Risk Assessment** – Periodic assessment of external and internal bribery risks, including financial and reputational exposures.
4. **Due Diligence** – Risk-based screening and monitoring of third parties and associated persons.
5. **Communication and Training** – Policy communicated to all staff and third parties; training provided as needed.
6. **Monitoring and Review** – Policies and procedures are regularly reviewed and updated for effectiveness.

12. Investigation and Enforcement

Allegations of bribery will be investigated promptly, fairly, and confidentially. Disciplinary action, up to and including dismissal, will be taken against any employee found to have breached this policy. Legal action may also be pursued where appropriate.

13. Integration with Other Policies

This Anti-Bribery Policy is part of SFM (UK) Ltd's wider compliance framework, including:

- Whistleblower Policy
- Anti-Tax Evasion Policy
- Code of Conduct

Staff are expected to read and adhere to all relevant policies.

14. Review

This policy will be reviewed at least annually or earlier if:

- There are changes in legislation or regulations
- Organisational structure or operations change
- New bribery risks are identified
- An incident or investigation highlights a need for revision
-

Approved by: George Hewitt
Position: Director, SFM UK LTD
Effective Date: 13/02/2026
Review Date: 12/02/2027

