

QCD 1009 ANTI-BRIBERY POLICY

Introduction

Frocester Security Ltd values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy
- Establishing and implementing appropriate anti-bribery procedures
- Communicating the policies and procedures to employees and to others who will perform services for Frocester Security Limited
- Undertaking due diligence measures before engaging others to represent Frocester Security Limited in its business dealings
- Monitoring and reviewing the risks and the effectiveness of the anti-bribery procedures that are in place

Policy

Frocester Security Ltd prohibits the offering, giving, solicitation or acceptance of any bribe (whether cash or other inducement)

- To or from any person or company (wherever they are situated and whether they are a public official or body or private person or company),
- By an individual employee, agent or other person or body acting on Frocester Security Limited behalf,
- In order to gain commercial, contractual or regulatory advantage for Frocester Security Limited in a way that is unethical
- Or in order to gain any personal advantage (pecuniary or otherwise) for the individual or anyone connected with the individual

This policy prohibits any inducement that results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action that may not be solely in the interests of Frocester Security Limited or of the person or body employing them or whom they represent.

This policy is not meant to prohibit normal and appropriate hospitality or the giving of a ceremonial gift on a festival or at another special time, providing they are customary in a particular market, are proportionate and are properly recorded.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in doubt as to whether a potential act constitutes bribery, the matter should be referred to Tom Allerton (Director) before proceeding.

Employees responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees and Frocester Security Limited is committed to:

- Encouraging employees to be vigilant and to report any suspicion of bribery
- Providing employees with suitable channels of communication and ensuring that sensitive information is treated appropriately
- Investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- Taking disciplinary action against any individual(s) involved in bribery

Any suspicion of bribery should be reported in confidence to Tom Allerton (Director) who has overall responsibility for bribery prevention.

Tom Allerton: 15 April 2024

Director _____
Sign and print name in full.



Date of next review: April 2025