

ANTI-BRIBERY & CORRUPTION POLICY 2024

1 Introduction

Central Industrial Services Limited has a number of fundamental principles and values which they believe are the foundation of sound and fair business practice and as such are important to uphold. One such principle is a zero tolerance position in relation to corruption, wherever and in whatever form that may be encountered. The Bribery Act 2010 was passed in April 2010 and has been in force since 1 July 2011.

2 Legal Obligations

It is CIS policy to comply with all laws, rules and regulations governing anti bribery and corruption law. Under UK law, bribery and corruption is punishable for individuals by up to 10 years imprisonment, and if the company is found to have taken part in corruption it could face an unlimited fine, be excluded from tendering for contracts and face untold damage to its reputation.

Under UK law the payment, or offer to pay bribes, or provision of or offer to provide gifts or anything of value for improper purposes to obtain or retain business or any other benefit, (whether for CIS or any other party) is prohibited. Such payments or gifts are also forbidden under the terms of this policy and may result in immediate dismissal for those involved in their payment or receipt.

CIS are required to keep financial records and to have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

3 Scope

It extends the crime of bribery to cover all private sector transactions (previously bribery offences were confined to transactions involving public officials and agents).

4 Criminal Offences

The offences contained in the Bribery Act carry criminal penalties for individuals and organisations. For individuals, a maximum prison sentence of ten years and/or an unlimited fine can be imposed; for companies, an unlimited fine can be imposed. The Act will be enforced by the Serious Fraud Office.

The Act creates four offences:

- A general offence covering offering, promising or giving a bribe.
- A general offence covering requesting, agreeing to receive or accepting a bribe.
- A distinct offence of bribing a foreign public official to obtain or retain business.
- A strict liability offence for commercial organisations where they fail to prevent bribery by those acting on their behalf.

5 Vigilance

The following is a list of bribery and corruption indicators suggested by the Serious Fraud Office which all staff should be aware of and should report any suspicious activity.

This list is not an exhaustive list:

- Abnormal cash payments
- Pressure exerted for payments to be made urgently or ahead of schedule
- Private meetings with public contractors or companies hoping to tender for contracts
- Lavish gifts being received
- Making unexpected or illogical decisions accepting projects or contracts
- Agreeing contracts not favourable to the organisation either with terms or time period
- Unexplained preference for certain contractors during tendering period
- Avoidance of independent checks on tendering or contracting processes
- Bypassing normal tendering/contractors procedure
- Invoices being agreed in excess of contract without reasonable cause
- Missing documents or records regarding meetings or decisions
- Company procedures or guidelines not being followed
- The payment of or making funds available for high value expenses on behalf of others.

6 Policy

This policy applies to individual employees, agents, sponsors, intermediaries, consultants or any other people or bodies associated with CIS. Bribery is committed when an inducement or reward is provided in order to gain any commercial, contractual, regulatory or personal advantage.

No bribes of any sort may be paid to or accepted from customers, Suppliers, Advisors or Representatives, Private person or Company. It is not permitted to establish accounts or internal budgets for the purpose of facilitating bribes or influencing transactions.

This policy does not prohibit the following practices providing they are customary in a particular market, or are proportionate and are properly recorded:

- Normal and appropriate hospitality (given or received)
- The giving of a ceremonial gift on a festival or at another special time

7 Expectations of CIS Staff

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout CIS.

8 Entertainment Hospitality Expenses

It is an offence under the Bribery Act to use corporate hospitality to influence the decisions of customers to purchase services from us.

Corporate hospitality must be reasonable and proportionate and have regard to the Company's expenses policy.

All corporate hospitality must be with the knowledge and permission of a Board Director.

9 Training and communications

This policy and relevant guidance will be communicated to employees across the Company through our established internal communication channels.

10 Further Guidance

Inevitably, decisions as to what is acceptable may not always be easy, particularly in the absence of minimum legal standards or where they are poorly enforced. If anyone is in doubt as to whether a potential act constitutes bribery/corruption, the matter should be referred to their immediate manager, or Director.

This policy is endorsed by the Chairman to demonstrate the Board's commitment.

Signed



DH Cartwright - Chairman

Date 05/01/2024