

Anti-bribery and Corruption Policy

Our Anti Bribery policy is zero-tolerance and applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.

Implementation

With regard to gifts and hospitality and expenses the following requirements are mandatory:

1. Carmelcrest forbids any officer or employee to solicit any gift or hospitality in the course of his/her employment.
2. Carmelcrest forbids any officer or employee from offering or receiving from any person or organisation who has had, has or may have any influence over the business of (the company):
 - a) A personal or corporate gift (to a value in excess of £100)
 - b) Hospitality (to a value in excess of £500 per head)
3. Carmelcrest forbids any officer or employee from offering or receiving any gift or hospitality which is in breach of relevant law.
4. All officers and employees of Carmelcrest must enter details of any gifts or hospitality which are permitted by paragraph 2 in to a central register of gifts maintained by the Office Manager which shall be subject to monitoring and auditing.
5. Compliance with this policy is a condition of each officer and employee's contract of employment.
6. Every employee or officer of Carmelcrest has a responsibility to speak out if they suspect corruption or are aware of any gift or hospitality given or received which may be in breach of this policy. Any concern in respect of such breach by:
 - Another member of staff
 - A third party representing Carmelcrest

- A Carmelcrest supplier or competitor
- A member company
- Any other stakeholders/customers must be reported to the (identify the relevant person or department) as soon as possible.

All allegations of any breach of this policy will be investigated. If any officer or employee has any questions on this policy please contact your line manager or (identify the relevant person with responsibility).

This policy shall be formally reviewed on an annual basis.

Reviewed and authorised by:

Ben Spooner



Managing Director

Date: 30th April 2018

Review by: 29th April 2019



Fire Door
Installation



Managing Director: B. Spooner
Company Registration No. 1731918
VAT Registration No. 945 6057 05