



77 Elmers End Road, London, SE20 7UU . Tel: 020 8778 6111 . Fax 0208 778 5060 . Email: general@ddclimited.com

Davies Design and Construction Ltd - Anti-corruption and bribery policy

1. About this policy

1.1 DDC Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. DDC Ltd has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

1.2 DDC Ltd will constantly uphold all UK laws relating to anti-bribery and corruption, including the Bribery Act 2010 and take our legal responsibilities seriously.

2. Who is covered by this policy?

2.1 This anti-bribery policy applies to all employees (whether temporary, fixed term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties).

2.2 In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

3. What is bribery?

3.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

3.2 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

3.3 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor).



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3.4 If they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the DDC Office Manager.

4. What is and what is not acceptable?

This section of the policy refers to 4 areas:

- ❖ Gifts and hospitality.
- ❖ Facilitation payments.
- ❖ Political contributions.
- ❖ Charitable contributions.

4.1 Gifts and Hospitality

4.1.1 DDC Ltd accepts normal and appropriate gestures of hospitality and goodwill (Whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- ❖ It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- ❖ It is not made with the suggestion that a return favour is expected.
- ❖ It follows UK law.
- ❖ It is given in the name of the company, not in an individual's name.
- ❖ It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- ❖ It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- ❖ It is given/received openly, not secretly.
- ❖ It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- ❖ It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the office manager.

4.1.2 Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the DDC Office Manager, who will assess the circumstances.

4.1.3 As good practice, gifts given and received should always be disclosed to the DDC Office Manager. Gifts from suppliers should always be disclosed.



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4.1.4 If there is any uncertainty, the advice of the DDC Office Manager should be sought.

4.2 Facilitation payments

4.2.1 DDC Ltd does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

4.2.3 DDC Ltd does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

4.3 Political contributions

4.3.1 DDC Ltd will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

1.4 Charitable contributions

4.4.1 DDC Ltd accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

4.4.2 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the office manager.

4.5 Employee responsibility

4.5.1 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

4.5.2 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. A DDC Director has the right to terminate a contractual relationship with an employee if they breach this policy.



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5. How to raise a concern

5.1 If you suspect that there is an instance of bribery or corrupt activities occurring in relation to DDC Ltd, you are encouraged to raise your concerns at as early a stage as possible with the office manager. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the office manager.

5.2 DDC Ltd will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially should they wish to.

6. What to do if you are a victim of bribery or corruption

6.1 You must tell the office manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7. Protection

7.1 If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, DDC Ltd understands that you may feel worried about potential repercussions. DDC Ltd will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.



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8. Record Keeping

8.1 DDC Ltd will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

X PP. R. K... X OFFICE MANAGER
Signature Job Title

X S. DAVIES X 26TH MAY 2022
Name Date