



Independent Safety Services Ltd
Unit 8
12 O' Clock Court
21 Attercliffe Road
Sheffield S4 7WW

Independent Safety Services Ltd

Anti-Bribery and Corruption Policy

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Independent Safety Services Limited, Unit 8, 12 O'clock Court, 21 Attercliffe Road, Sheffield, S4 7WW. Company Registered No. 3958917

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Revisions control page

Version Number	Date	Summary of changes made	Changes made by
V1.1	27/07/2023	Updated front cover	Dr Anne Woolridge

Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure our business is conducted in a socially responsible manner. This policy applies to all countries and territories in which we operate as an organisation. This policy needs to be read alongside our related policies and procedures where appropriate.

Policy Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Corruption involves the abuse of office and position to benefit a third party (an individual, business or other organisation), in return for payment or other reward. 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.

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We take our legal responsibilities extremely seriously.

Scope

Who is Covered by the Policy?

In this policy, third party means any individual or organisation you we meet during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

This policy applies to all employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy). It also applies to Officers, Trustees, Board and or Committee members.

This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments
- Political contributions; and
- Charitable contributions.

Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

Gifts and Hospitality

We accept normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meet the following requirements:

- a. 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.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. 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).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the company's COO (usually in excess of £100).
- k. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Chief Operating Officer or Managing Director.

Facilitation Payments and Kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low-level officials to obtain a level of service, which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to the Chief Operating Officer or Managing Director.

Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Charitable Contributions



Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation on behalf of the organisation must be offered or made without the prior approval of a member of the Leadership Team.

Record-keeping

Employees must declare and keep a written record of all gifts accepted or offered, which will be subject to management review.

Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy.

How to Raise a Concern

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with the Chief Operating Officer or Managing Director.

What to do if you are a Victim of Bribery or Corruption

It is important that you tell the Chief Operating Officer or Managing Director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees receive regular, relevant training on how to adhere to this policy.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Please refer to the Bribery Act Statement – Appendix A.

Who is Responsible for the Policy?

The Senior Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Senior Management Team has general responsibility for monitoring the operation and effectiveness of our anti-bribery arrangements. The Chief Operating Officer has primary and day-to-



day responsibility for implementing this policy and for dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employee's contract of employment and it may be amended at any time.

This policy is available to all staff, clients, members of the public and stakeholders on request and at the following web address: <http://www.issafe.co.uk/policies/>

A handwritten signature in black ink, appearing to read 'Dr Anne Woolridge', with a long horizontal flourish at the end.

Signed
Dr Anne Woolridge, Chief Operating Officer

Date: 24th April 2023