

# ANTI-BRIBERY & CORRUPTION POLICY

## Policy Brief & Purpose

Delton Contracts Services Ltd. is committed to conducting all business in an honest and ethical manner. We maintain a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships. We will implement and enforce effective systems to counter bribery to protect the reputation and integrity of the company.

## Scope

This policy applies to all individuals working for Delton Contracts Services Ltd. at all levels and grades, including senior managers, directors, employees (permanent, fixed-term, or temporary), consultants, contractors, and any other person providing services to us.

## Policy Elements

What is Bribery?: A bribe is a financial or other advantage offered, promised, or given to anyone to persuade them to perform their duties improperly, or to any public official with the intention of influencing them in the performance of their duties.

Gifts and Hospitality: This policy does not prohibit normal and appropriate hospitality or the giving and receiving of low-value promotional gifts. However, any gift or hospitality must:

- Not be made with the intention of inducing improper performance or influencing a business decision unfairly.
- Be reasonable, proportionate, and for legitimate business purposes, such as building goodwill.
- Be declared and recorded if it exceeds the company thresholds.

## Delton Contracts Services Ltd. Threshold Guidelines:

- **Acceptable:** Branded promotional items (pens, mugs, etc.) or "thank you" gifts under £100. Modest business refreshments or meals up to £250.
- **Requires Approval:** Any gift exceeding £100 or hospitality exceeding £250 must be approved by a Director and recorded in the Company Gift Register.
- **Prohibited:** Cash or cash equivalents (vouchers/gift cards), lavish or excessive entertainment, and any gift offered during an active competitive tender process.

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## **Facilitation Payments and Kickbacks**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. All associates must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted.

## **Charitable and Political Contributions**

- **Political:** Delton Contracts Services Ltd. does not make contributions to political parties.
- **Charitable:** No charitable donations shall be made for the purpose of gaining a commercial advantage.

## **Record Keeping**

We will maintain financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties. All accounts, invoices, and other documents relating to dealings with third parties must be prepared with strict accuracy. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **Raising a Concern**

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

- No employee will suffer any detriment or disciplinary action for raising genuine concerns in good faith, even if they turn out to be mistaken.
- Concerns should be reported to a Director or through the company's Whistleblowing procedure.

## **Non-Compliance**

Any breach of this policy will be regarded as a serious matter and may result in disciplinary action, up to and including summary dismissal. Serious breaches may also be reported to law enforcement agencies, potentially leading to criminal prosecution under the Bribery Act 2010.

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**Approved by:** Gurbakhs Singh

**Position:** Managing Director

Approved by	G.Singh Director	Signed: 	Date 6/3/2025
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