



Anti-Bribery & Anti-Corruption Policy

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

Our Anti-Bribery & Anti-Corruption Policy sets down our approach to preventing, detecting and reporting fraud and bribery within our company. We are fully committed to minimising our exposure to fraud, corruption and bribery. Fraud and bribery are crimes, and we are committed to eradicating the risk of fraud and bribery.

This policy will assist in raising awareness both to the risk of fraud and bribery and the means of preventing it, as well as identifying existing procedures for reducing the likelihood of such events occurring.

Martin Reynolds has the overall responsibility for delivering and understanding this policy and the controls needed to ensure it is implemented throughout.

Under the Fraud Act 2006 Act, any individual who dishonestly makes a false representation to make a gain for themselves or another, or dishonestly fails to disclose to another person information which they are under a legal duty to disclose, or commits fraud by an abuse of position, may be found guilty of the offence of fraud. Such elements of fraud will be taken to include theft, the removal of cash or assets to which the fraudster is not entitled to or giving false documentation or alteration of any accounting records.

The Bribery Act 2010 creates four offences, such as offering, promising or giving a bribe; requesting, agreeing to receive or accepting a bribe; bribing a foreign official to retain business; and the failure of an organisation to prevent a bribe being paid on its behalf.

A function or activity to which a bribe relates includes any function of a public nature and any activity connected with a business. Organisations are therefore expected to ensure that appropriate procedures are in place for bribery prevention.

We will operate a zero tolerance to fraud and bribery and while we do not anticipate that fraud or bribery will occur within our company, any suspected cases of fraud or bribery will be investigated and pursued, with the maximum penalties being sought through criminal/civil and employer disciplinary actions.

Under the Bribery Act 2010, six key principles have been identified to help inform an organisation in establishing procedures to prevent bribery and we will also adopt these to assist in preventing fraud. The main principles are outlined below and are proportionate to the size of our company, together with the procedures which sit under them to prevent fraud and bribery. The main aim of the Bribery Act 2010 relates to those who conduct business in foreign markets. In view of our limited exposure outside the UK, the procedures primarily reflect the need to mitigate domestic bribery.

Full commitment from all management must be implemented and persons will be made aware of this policy and that disciplinary action will be taken. Proof of fraud or bribery may result in criminal proceedings.

The procurement of goods and services are maintained at the office level only to ensure control of the provision of our services and ensure they are not outsourced to others. We will ensure our internal procedures are adopted to guard against fraud and bribery.



All staff will be made aware of our intolerance to any fraud or bribery, and their own individual personal responsibilities. We will be alert to opportunities for improving our procedures to minimise the risk of fraud and bribery and ensure financial management controls are maintained and that financial reporting is monitored.

We will ensure that all employees are aware of our commitment to whistle blowing and that we welcome persons to report any concerns and ensure their contracts of employment are completed and that all persons are made aware of this policy and that they must complete an Expenses Claim Policy with the relevant receipts attached.

Our policy on accepting gifts and hospitality and that any receipt of such must be referred to the head office. No person should give, promise or offer a payment, gift or hospitality unless there is believed that a business advantage will be received.

If any person is threatened or coerced into engaging in conduct, which might amount to a possible breach of this policy, then they may act in a way which will safeguard their health and safety and when safe to do so, report to the office.

All reports of fraud or bribery will be fully investigated and reported to the managing director who will ensure that the required accounts and records are submitted to the relevant persons as required.

A handwritten signature in black ink, appearing to be 'M. Reynolds'.

Martin Reynolds
Managing Director

A handwritten signature in blue ink, appearing to be 'Mick Whyte'.

Mick Whyte
Commercial Director