

22-016 Anti-Bribery Policy			C4 Cleaning Ltd	
			1-2 Chalice Close, Lavender Vale, Wallington SM6 9RU	
Name:	Courtney Hanson-Chambers	Signature:		Date: 01.02.2026
Title:	Director			Review: 31.01.2027

Purpose

C4 Cleaning Ltd is committed to conducting all aspects of its business with integrity, honesty, and transparency. This policy outlines the Company's zero-tolerance approach to bribery and corruption and ensures compliance with the UK Bribery Act 2010. Its purpose is to prevent, identify, and address any form of bribery or corrupt behaviour within the Company's operations and business relationships.

Scope

This policy applies to all persons working for or on behalf of the Company, including:

- Employees, directors, and officers;
- Contractors, consultants, and agency workers;
- Suppliers, service providers, business partners, and third-party representatives.

All individuals and organisations associated with the Company are expected to uphold the highest ethical standards and comply with this policy at all times.

Key Commitments

Zero-Tolerance Approach

The Company has a zero-tolerance stance on all forms of bribery and corruption. We act professionally, fairly, and with integrity in all our business dealings and relationships.

Legal Compliance

The Company complies fully with the UK Bribery Act 2010 and ensures adequate procedures are in place to prevent bribery from occurring within its operations or supply chain.

Gifts, Hospitality, and Donations

The Company recognises that normal and appropriate hospitality and gifts can be part of building business relationships. However, such activities must:

- Be proportionate, reasonable, and offered in good faith;
- Never be intended to influence a business decision or gain improper advantage;
- Be recorded accurately in the Company's gift and hospitality register;
- Not include cash or cash equivalents (e.g., gift vouchers).

Any charitable donations must be lawful, transparent, and approved by a Company Director.

Definition of a Bribe

A bribe is any offer, promise, giving, request, or acceptance of a financial or other advantage with the intent to influence the actions of another person to obtain or retain business or a business advantage.

Examples include:

- Offering money or gifts to secure a contract;
- Accepting lavish hospitality in exchange for favourable treatment;
- Making facilitation payments or "kickbacks" to expedite services;
- Offering employment or benefits to influence a decision.

Responsibilities: Director's Responsibility

The Director holds overall accountability for implementing this policy, ensuring that effective anti-bribery controls and training are in place, and promoting a culture of compliance.

Responsibilities: Management Responsibility

Managers are responsible for communicating this policy to their teams, monitoring compliance, and taking prompt action where risks or breaches are identified.

Responsibilities: Employee Responsibility

All employees must:

- Avoid activities that could lead to, or suggest, a breach of this policy;
- Immediately report any suspicion or incident of bribery or corruption;
- Declare all gifts, hospitality, or benefits offered or received;
- Seek guidance if uncertain about the appropriateness of an action.

Reporting and Action

Employees and business partners are encouraged to raise concerns about potential bribery or corruption as early as possible. Concerns should be reported to a manager or directly to the Company Director.

The Company will:

- Investigate all reports promptly and confidentially;
- Take appropriate disciplinary or contractual action where misconduct is confirmed;
- Support employees who report concerns in good faith, even if allegations are not substantiated.

Tips and Best Practices

1. If unsure whether an act constitutes bribery, seek advice from your manager before proceeding.
2. Always retain receipts for payments or expenses made on behalf of the Company.
3. Report any offers of improper payment or benefit immediately.
4. The Company will protect whistleblowers and ensure no retaliation occurs for reporting genuine concerns.

Non-Compliance

Non-compliance with this policy is a serious disciplinary matter.

Breaches may result in:

- Disciplinary action up to and including dismissal;
- Termination of business relationships;
- Reporting to relevant law enforcement or regulatory authorities.

Failure to comply with the UK Bribery Act 2010 can result in severe criminal penalties for both the individual and the Company, including fines and imprisonment.

Policy Review

This policy will be reviewed annually, or sooner if there are changes to legislation or the Company's operations. Updated versions will be communicated to all employees and business partners.