

# **Anti-Bribery and Corruption Procedure**

Effective Date: 3rd December 2024

Review Date: 3rd June 2025

## 1. Purpose

Yorkshire Building Control Ltd is committed to conducting its business ethically and lawfully. This Anti-Bribery and Corruption Procedure sets out our commitment to prevent bribery and corruption in all aspects of our operations and outlines the responsibilities of all those working with and for us in upholding that commitment.

#### 2. Scope

This procedure applies to:

- All employees, inspectors and directors of Yorkshire Building Control Ltd.
- Contractors, subcontractors, suppliers, and other business partners acting on behalf of the company.
- Any individual or organisation connected to our operations.

#### 3. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of another person in an improper way.
- Corruption: The abuse of entrusted power for private gain.
- **Facilitation Payment:** Small, unofficial payments made to secure or speed up routine actions.

#### 4. Responsibilities

- Managing Director:
  - o Overall responsibility for implementing and monitoring this procedure.
- Managers and Supervisors:
  - Ensure that employees understand and adhere to the procedure and report any concerns.

#### All Employees:

o Required to act with integrity and comply with this procedure at all times.



## Suppliers and Contractors:

o Expected to comply with our anti-bribery and corruption standards.

#### 5. Procedure

## **5.1 Prohibition of Bribery**

- Offering, paying, soliciting, or accepting bribes of any kind is strictly prohibited.
- This includes direct and indirect payments, such as gifts, hospitality, or other benefits intended to influence decisions.

#### **5.2 Gifts and Hospitality**

- Modest, reasonable, and proportionate hospitality and promotional gifts are acceptable if they are transparent and in line with company policy.
- Any gifts or hospitality must be declared and recorded in the company's Gifts and Hospitality Register.
- Gifts or hospitality that could be perceived as influencing a decision must be declined.

#### **5.3 Facilitation Payments**

- Facilitation payments are prohibited.
- If faced with a request for such a payment, employees must refuse and report the incident to management immediately.

#### 5.4 Charitable and Political Donations

- Charitable donations must be transparent and in line with company values.
- Yorkshire Building Control Ltd does not make political donations.

## 6. Reporting Concerns

- Employees and stakeholders are encouraged to report any concerns about bribery or corruption.
- Reports can be made confidentially via:
  - o **Email:** wendy.blades@yorkshirebc.co.uk
  - o Phone: 01377 256 538
- No employee will suffer any penalty or retaliation for refusing to pay a bribe or reporting suspected bribery.



#### 7. Investigations and Consequences

- Reports of bribery will be thoroughly investigated by a designated compliance manager or senior manager.
- Any employee found to have breached this procedure will face disciplinary action, which may include dismissal.

Yorkshire Building Control Ltd will terminate relationships with any business partners involved in bribery or corruption.

## 8. Training and Communication

- All employees will receive training on this procedure as part of their induction and through regular updates.
- Managers will ensure this procedure is communicated effectively to relevant suppliers and contractors.

#### 9. Compliance

Yorkshire Building Control Ltd will:

- Comply with all applicable anti-bribery and corruption laws, including the Bribery Act 2010.
- Publish an annual statement confirming our ongoing commitment to preventing bribery and corruption.
- Review and update this procedure regularly to ensure its effectiveness.

## 10. Monitoring and Review

- This procedure will be reviewed annually or when significant changes occur.
- Key performance indicators (KPIs) may include:
  - o Number of employee training completions.
  - o Number of reported concerns and investigations conducted.

Compliance audit results.

#### 11. Related Policies and Documents

- Whistleblowing Policy
- Code of Conduct
- Supplier Code of Conduct
- Financial Management Policy
- Conflicts of Interest Policy



## 12. Contact Details

# **Yorkshire Building Control Ltd**

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