



# ANTI-BRIBERY AND CORRUPTION POLICY



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## **Anti-Bribery and Corruption Policy**

### **Introduction**

At Design & Management Contractors Ltd we appreciate the importance of ethical behaviour to our relations with clients, stakeholders, contractors and employees. We are committed to this behaviour and this policy is part of those commitments.

The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires Design & Management Contractors Ltd to implement 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of Design & Management Contractors Ltd people and Design & Management Contractors Ltd businesses in preventing bribery and corruption and how we will implement 'adequate procedures' to do so.

### **Definition**

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct.

Bribery and corruption can be direct or indirect through third parties like agents, brokers and joint venture partners.

### **Scope**

Under the UK Bribery Act 2010, Design & Management Contractors Ltd is required to put procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of Design & Management Contractors Ltd. Consequently, this policy applies to every employee, contractor, director and officer in every wholly-owned Design & Management Contractors Ltd company.

Contractors, consultants or suppliers who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf. Independent contractors, consultants or suppliers will be made aware of this policy as it applies to our people in their dealings with them.

### **Policy**

Design & Management Contractors Ltd does not tolerate any form of bribery or corruption.

You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. You must follow the anti-bribery and corruption laws to which you and Design & Management Contractors Ltd are subject, remembering that UK anti-bribery and corruption laws apply wherever you are operating.

You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

You must ensure people who work for and with you understand bribery and corruption is unacceptable.

You must comply with Design & Management Contractors Ltd's procedures for the prevention of bribery and corruption.

### **Adequate procedures**

Anti-bribery and corruption is a business priority. Design & Management Contractors Ltd shall regularly and systematically identify bribery and corruption risks in its business and implement adequate risk-based procedures aimed at preventing bribery and corruption occurring including:

- **Communication** – We will communicate this policy and relevant guidance to employees across the Group, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.
- **Training** – We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

- **Records** – We will maintain adequate records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.
- **Audit** – Our internal control systems will be subject to regular internal and independent audit to provide assurance that they are effective in countering bribery and corruption.
- **Business relationships** – We will ensure that our business partners –including contractors, suppliers and agents –are fit to do business with.
- **Supply chain** – We will address bribery and corruption risk in our supply chain including by ensuring that payments made for goods and services are reasonable.
- **Conflicts of interest – Gifts and hospitality** – We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.

## **Responsibilities**

The Managing Director is the director with primary accountability for our anti-bribery and corruption efforts and shall report the results of adherence to this policy at least annually to the Design & Management Contractors Ltd Board of Directors.

Each director has responsibility for implementing the anti-bribery and anti-corruption strategy, policy and process within their designated section of Design & Management Contractors Ltd.

## **Reporting actual or potential violations and seeking guidance**

You must report actual, potential or suspected corruption in Design & Management Contractors Ltd or by any individual or organisation with whom Design & Management Contractors Ltd does business. Failure to do so may result in liability for Design & Management Contractors Ltd and for you personally.

You must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an intention or plan to violate this policy.

You have a similar obligation to report any information or knowledge of any hidden fund or asset, of any false or artificial entry in Design & Management Contractors Ltd's books and records, or any payment that circumvents Design & Management Contractors Ltd's internal financial processes.

**Reports must be made immediately. Your report may be made to the relevant director for your department or to the Managing Director.**

If any instance of bribery or corruption is identified, an investigation will take place under the guidance of the Managing Director or their nominated person.

You can also contact your direct line manager to seek advice on anti- bribery and corruption issues or to make suggestions for how we could improve our anti-bribery and corruption policy and procedures.

## **Monitoring and review**

The Design & Management Contractors Ltd board of directors is committed to regular review and will assess the company's compliance with this policy.

The Design & Management Contractors Ltd Board of Directors may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.

Signed: .....

Date: .....

Position: .....

Review Date: .....