

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Last Updated (May 2026) Ref Bribery 0526

The prevention of bribery and corruption is taken seriously by **The Pro Performance Services Group T/A Complete Structures (PPSG)**, but during our business activities we may be exposed to risks relating to bribery or other forms of improper conduct. PPSG is committed to conducting its business fairly, honestly and transparently, and to complying with all applicable legal and regulatory obligations relating to bribery and corruption.

This policy applies to current and former employees, workers, volunteers, interns, apprentices, sub-contractors, consultants and any other individuals or organisations acting for, or on behalf of, PPSG. If you fall into one of these categories, then this policy applies to you, and you must always comply with it. You should read this policy alongside your contract of employment (or contract for services) and any other policies or procedures issued by PPSG from time to time.

PPSG has taken steps to minimise the risk of bribery and corruption and will provide appropriate guidance and training to staff as part of the induction process and on an ongoing basis. Failure to comply with this policy may result in disciplinary action and, in serious cases, dismissal and/or legal action.

1. Policy Purpose

This policy explains:

- what constitutes bribery and corruption;
- the standards of behaviour expected by PPSG;
- your responsibilities when working for, or on behalf of, PPSG; and
- how to raise concerns if you suspect bribery or corruption.

PPSG adopts a zero-tolerance approach to bribery and corruption in any form.

2. Relevant Legislation

PPSG is subject to the **UK Bribery Act 2010**, which applies to bribery and corruption in both the public and private sectors and has extra-territorial effect. The Act makes it a criminal offence to offer, promise, give, request or accept a bribe and introduces a corporate offence of failure to prevent bribery.

PPSG is committed to complying fully with the Bribery Act 2010 and any associated guidance or regulatory requirements.

3. How We Define Bribery

For the purposes of this policy, **bribery** means offering, promising, giving, requesting or accepting a financial or other advantage with the intention of inducing or rewarding improper performance of a function or activity.

A bribe may include, but is not limited to:

- cash or cash equivalents;
- gifts or hospitality;
- facilitation payments;
- excessive discounts, commissions or fees;
- political or charitable donations made to gain an improper advantage.

Bribery can be committed directly or indirectly, including through third parties.

4. How We Define Corruption

Corruption includes bribery and any other dishonest or improper conduct designed to secure an unfair advantage or to influence decision-making improperly.

5. Failure to Prevent Bribery

PPSG may be held criminally liable if a person associated with PPSG bribes another person intending to obtain or retain business or a business advantage for PPSG.

Associated persons include employees, agents, contractors, consultants and any other persons performing services for, or on behalf of, PPSG.

PPSG's policies, procedures and controls are designed to prevent bribery, and compliance with this policy is mandatory for all relevant individuals.

6. Gifts, Hospitality and Expenses

Reasonable and proportionate gifts or hospitality may be offered or accepted where they are:

- infrequent and of low value;
- appropriate to the business context;
- not intended to influence a business decision; and
- transparent and properly recorded.

You must not offer or accept gifts or hospitality which could reasonably give rise to the perception of bribery. Cash or cash-equivalent gifts are strictly prohibited.

7. Facilitation Payments

Facilitation payments are unofficial payments made to secure or expedite routine actions. These payments are illegal under UK law and are strictly prohibited by PPSG, regardless of value or local custom.

If you are asked to make such a payment, you must report this immediately.

8. Political and Charitable Donations

PPSG does not make political donations. Charitable donations and sponsorships must not be used as a means of securing an improper advantage and must be approved in advance by senior management.

9. Your Responsibilities

Everyone who works for, or on behalf of, PPSG has a responsibility to:

- act honestly, ethically and with integrity always;
- comply with this policy and related procedures;
- avoid activities that could lead to a breach of this policy;
- remain vigilant to bribery and corruption risks; and
- report any concerns promptly.

You must never offer, promise, give, request or accept a bribe under any circumstances.

10. How to Raise a Concern

If you are aware of, or suspect, bribery or corruption (whether involving PPSG or a third party), you must report it immediately to your line manager or the person responsible for compliance within PPSG.

PPSG will take all concerns seriously and investigate them appropriately. No individual will be subjected to adverse treatment for raising a genuine concern in good faith.

11. Breaches of This Policy

Any breach of this policy may result in disciplinary action, up to and including dismissal for gross misconduct. In addition, breaches may expose individuals and PPSG to criminal prosecution and significant financial penalties.