



ANTI-BRIBERY AND CORRUPTION POLICY

Company: Connect Skilled Contractor Service Ltd

Version: 1.2

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Anti-Bribery, Anti-Corruption, Fraud Prevention and Competition Law Policy

1. Fraud and Malpractice Prevention Processes

Connect Skilled Contractor Service Ltd is committed to conducting all business activities with honesty, integrity, transparency and accountability. The Company operates a strict zero-tolerance approach towards fraud, bribery, corruption, financial crime, money laundering, tax evasion facilitation, collusion and all forms of unethical or unlawful conduct. Every Director, employee, subcontractor, labour provider, consultant and supplier working on behalf of the Company is expected to comply with this policy and the requirements of UK legislation.

The primary objective of our fraud prevention system is to eliminate opportunities for dishonest behaviour before it occurs. We recognise that prevention is significantly more effective than responding after an incident has taken place. Consequently, fraud prevention is integrated into our business management systems, procurement procedures, financial controls, recruitment practices and project delivery processes.

To reduce the risk of fraud and malpractice, the Company has implemented the following management controls:

- Verification of every supplier, subcontractor and labour provider before appointment, including Companies House checks where applicable, identity verification, insurance validation, competency certification, Constructionline accreditation where relevant, CSCS/CPCS card verification, Right to Work checks and confirmation of trading legitimacy.
- Due diligence before awarding any subcontract or purchase order, ensuring businesses are financially stable, technically competent, legally compliant and capable of delivering services ethically.
- Purchase orders are issued before goods or services are supplied wherever practicable, ensuring all procurement follows an authorised approval process.
- Supplier invoices are checked against approved quotations, purchase orders, delivery notes, completed works and contractual agreements before payment is authorised.
- Financial transactions are monitored for irregularities including duplicate invoices, inflated pricing, unusual payment requests, changes to bank details, excessive variations, unexplained cost increases and abnormal purchasing behaviour.
- Requests to amend supplier bank details are independently verified using known contact details before any payment is released.
- Competitive quotations are obtained where appropriate to demonstrate value for money and reduce procurement fraud.
- Project Managers continually monitor labour, plant, materials and subcontractor performance throughout each project to identify unusual activity or potential fraudulent practices.
- Site Managers verify completed works before applications for payment are approved.
- Contract documentation, quotations, payment records, delivery notes and inspection records are retained in accordance with company document retention procedures to provide a complete audit trail.
- Risk assessments consider financial, procurement and ethical risks alongside health and safety risks to identify opportunities where fraud or malpractice could occur.
- Internal management reviews are undertaken to assess compliance with company procedures and identify opportunities for continual improvement.
- Employees are reminded that knowingly submitting false information, falsifying records, accepting inducements or misrepresenting work completed constitutes gross misconduct and may result in dismissal, contract termination and referral to law enforcement agencies.

Training forms part of our fraud prevention strategy. During induction and periodically thereafter, employees receive awareness training covering fraud prevention, procurement controls, conflicts of interest, bribery risks, whistleblowing procedures and reporting obligations. Refresher training is provided whenever legislation changes or where monitoring identifies additional risks.

2. Review of Processes Against the Bribery Act 2010

The Company regularly reviews its Anti-Bribery Management System to ensure it remains compliant with the requirements and principles contained within the Bribery Act 2010.

The Managing Director is responsible for ensuring this policy reflects current legislation, recognised industry best practice and operational risks. Formal reviews are undertaken at least annually and additionally whenever any of the following occur:

- Changes to UK legislation or Government guidance.
- Significant organisational changes.
- Entry into new sectors or geographical regions.
- Appointment of new key suppliers or labour providers.
- Following any reported incident, investigation or identified weakness.
- Recommendations arising from internal audits or external assessments.
- Following Constructionline, client or certification audits.

During each review the Company evaluates whether existing procedures remain proportionate to the level of risk faced by the business. This assessment includes reviewing procurement procedures, financial controls, hospitality registers, gifts and entertainment records, conflict of interest declarations, whistleblowing reports, supplier due diligence procedures and staff awareness training.

The review process follows the six principles published by the Ministry of Justice for adequate procedures under the Bribery Act 2010:

- Proportionate procedures.
- Top-level commitment.
- Risk assessment.
- Due diligence.
- Communication and training.
- Monitoring and continuous improvement.

Any identified weaknesses are recorded within the Company's Continuous Improvement Register and corrective actions are assigned with target completion dates. Updated procedures are communicated to all relevant personnel and additional training is delivered where necessary.

3. Reporting and Investigation of Bribery, Corruption and Anti-Competitive Behaviour

All workers have both the authority and responsibility to report suspected bribery, corruption, fraud, collusion, bid-rigging, cartel activity, abuse of authority or any other unethical behaviour immediately.

Concerns may be reported verbally or in writing and can include:

- Offering or accepting bribes.
- Undisclosed gifts or hospitality.
- Conflicts of interest.
- False invoicing.
- Procurement fraud.
- Collusion between suppliers.
- Bid-rigging.
- Price fixing.
- Market sharing.
- Abuse of confidential tender information.
- Financial irregularities.
- Tax evasion facilitation.
- Suspicious supplier behaviour.

Reports are treated confidentially and, where legally possible, the identity of the individual making the report is protected. No employee will suffer retaliation, discrimination or victimisation for raising genuine concerns in good faith.

Upon receiving a report, the Company follows a structured investigation procedure:

1. The allegation is recorded within the confidential Compliance Register.
2. Initial evidence is secured to prevent loss or alteration.
3. A preliminary risk assessment determines the seriousness of the allegation.
4. Relevant documentation including contracts, invoices, emails, procurement records and financial transactions is reviewed.

5. Witnesses may be interviewed where appropriate.
6. Findings are documented objectively.
7. Appropriate disciplinary, contractual or legal action is taken where allegations are substantiated.
8. Lessons learned are incorporated into revised procedures and additional staff training where required.

Where criminal offences are suspected, the Company will cooperate fully with the Police, Serious Fraud Office, National Crime Agency, HM Revenue & Customs or other relevant enforcement authorities.

4. Compliance with Anti-Bribery and Corruption Legislation

The Company maintains compliance with all applicable UK legislation relating to bribery, corruption, fraud and financial crime, including:

- Bribery Act 2010.
- Fraud Act 2006.
- Proceeds of Crime Act 2002.
- Criminal Finances Act 2017.
- Companies Act 2006.
- Public Contracts Regulations where applicable.
- Modern Slavery Act 2015 where relevant to supply chain management.

Compliance is achieved through documented management systems which include:

- Regular legal compliance reviews.
- Due diligence on suppliers and subcontractors.
- Financial approval procedures.
- Procurement controls.
- Conflict of interest declarations.
- Gifts and hospitality register.
- Ethical procurement procedures.
- Staff induction and refresher training.
- Internal audits.
- Risk assessments.
- Whistleblowing arrangements.
- Record keeping and audit trails.
- Management reviews.

- Corrective and preventive action procedures.

Employees are expected to immediately disclose any actual, perceived or potential conflict of interest before participating in procurement, contract award or financial decision-making.

Failure to comply with this policy may result in disciplinary action, contract termination, recovery of financial losses and referral to the appropriate enforcement authorities.

5. Designated Person for Reporting Concerns

Overall responsibility for implementing, monitoring and enforcing this policy rests with the Managing Director.

Employees, subcontractors, agency workers, consultants, suppliers and other interested parties should report concerns to:

Designated Compliance Officer: Managing Director

The designated person is responsible for:

- Receiving confidential reports.
- Recording allegations securely.
- Conducting or overseeing investigations.
- Maintaining confidentiality.
- Protecting whistleblowers.
- Liaising with legal advisers and enforcement authorities where necessary.
- Implementing corrective actions.
- Monitoring trends.
- Reporting significant issues to senior management.
- Reviewing the effectiveness of company controls.

Where concerns involve the Managing Director, reports may be submitted directly to the Company's appointed Accountant, Solicitor or relevant regulatory authority.

6. Compliance with Competition Law

Connect Skilled Contractor Service Ltd is committed to fair, open and lawful competition. The Company competes solely on quality, competence, service, innovation, safety and commercial value.

We comply with all applicable UK competition legislation, including:

- Competition Act 1998.
- Enterprise Act 2002.
- Digital Markets, Competition and Consumers Act 2024.

Employees are prohibited from engaging in any activity which could restrict competition or distort the marketplace.

This includes, but is not limited to:

- Price fixing.
- Bid-rigging.
- Market allocation.
- Customer sharing.
- Collusive tendering.
- Exchange of commercially sensitive information.
- Anti-competitive agreements.
- Abuse of confidential competitor information.
- Agreements intended to restrict market competition.

Tender prices are prepared independently without communication with competitors. Commercially sensitive information received from clients remains confidential and is never shared outside authorised business purposes.

7. Arrangements to Detect and Prevent Anti-Competitive Behaviour

The Company has established management systems designed to identify and prevent anti-competitive conduct before it occurs.

These arrangements include:

- Independent preparation of quotations and tenders.
- Competitive procurement procedures.
- Supplier due diligence.
- Conflict of interest declarations.

- Monitoring procurement decisions.
- Financial oversight by management.
- Periodic internal audits.
- Risk assessments covering procurement and commercial activities.
- Staff training on competition law.
- Monitoring unusual pricing patterns or supplier relationships.
- Segregation of commercial decision-making where practicable.
- Confidential reporting procedures.
- Management review meetings.
- Corrective action tracking.
- Annual policy reviews.
- Continuous improvement of business controls.

Compliance with competition law forms part of employee induction and refresher training. Any suspected anti-competitive behaviour is investigated immediately using the Company's formal investigation procedure.

The effectiveness of these arrangements is reviewed annually, after significant legislative changes, following internal audits, after any reported incident, and whenever lessons learned identify opportunities to strengthen our compliance framework. The Company is committed to continual improvement and will update its procedures whenever necessary to maintain full compliance with UK legislation, Constructionline Gold requirements and recognised industry best practice.

Competition Law Compliance

Commitment to Competition Law

Connect Skilled Contractor Service Ltd is committed to complying with the Competition Act 1998 and all applicable UK competition laws. We conduct our business fairly, honestly and independently and will not engage in any anti-competitive practices that could restrict, distort or prevent fair competition.

Anti-Competitive Behaviour

The Company prohibits all directors, employees, contractors and anyone acting on its behalf from engaging in anti-competitive behaviour, including but not limited to:

- Agreeing prices, discounts or charges with competitors.
- Sharing commercially sensitive information with competitors.
- Bid rigging or collusive tendering.
- Market sharing or customer allocation arrangements.

- Agreements that restrict fair competition or abuse a dominant market position.

Any employee who becomes aware of suspected anti-competitive behaviour must report it immediately to a Director.

Arrangements to Ensure Compliance

To ensure compliance with competition law, the Company will:

- Provide guidance and awareness to employees on competition law requirements.
- Monitor business practices to identify potential competition law risks.
- Require employees to avoid discussions with competitors regarding pricing, tenders or commercially sensitive information.
- Investigate any concerns relating to anti-competitive behaviour.
- Take appropriate disciplinary action where breaches occur.
- Review this policy regularly to ensure continued compliance with legislation.

Failure to comply with this policy may result in disciplinary action and, where appropriate, referral to the relevant enforcement authorities.

Competition Law & Anti-Competitive Behaviour Statement

Connect Skilled Contractor Service Ltd is committed to complying with the Competition Act 1998, the Enterprise Act 2002 and all applicable UK competition laws. The Company conducts all business fairly, ethically and independently, ensuring that competition is not restricted or distorted.

To detect and prevent anti-competitive behaviour, the Company has implemented the following arrangements:

- Directors and employees are made aware of their obligations under UK competition law.
- The Company does not participate in price-fixing, bid-rigging, market sharing, customer allocation or any agreement that restricts fair competition.
- Commercially sensitive information is not shared with competitors.
- Tendering and procurement activities are carried out independently and transparently, with pricing based solely on the Company's own commercial judgement.
- Any suspected breach of competition law must be reported immediately to the Company Director and investigated without delay.
- Competition law compliance is reviewed periodically as part of the Company's management and governance processes.

- Any employee or subcontractor found to have engaged in anti-competitive behaviour may be subject to disciplinary action, termination of contract and, where appropriate, reporting to the relevant regulatory authorities.

This policy applies to all directors, employees, agency workers and subcontractors acting on behalf of Connect Skilled Contractor Service Ltd and forms part of the Company's commitment to maintaining the highest standards of legal compliance, integrity and ethical business conduct.

1. Policy Statement

Connect Skilled Contractor Service Ltd is committed to conducting all business honestly, fairly and with integrity. The Company operates a zero-tolerance approach towards bribery, corruption, fraud and unethical business practices.

The Company complies with the Bribery Act 2010 and all applicable UK legislation. No employee, director, subcontractor, labour supplier or person acting on behalf of the Company may offer, promise, give, request or accept any form of bribe or corrupt payment.

2. Purpose

This policy establishes procedures to prevent bribery and corruption throughout all areas of the Company's operations and supply chain.

3. Scope

This policy applies to:

- Directors
- Employees
- Temporary workers
- Agency workers
- Apprentices
- Labour-only subcontractors

- Consultants
 - Suppliers
 - Anyone representing Connect Skilled Contractor Service Ltd
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4. Company Commitment

The Company will:

- Conduct business ethically.
 - Reject bribery in every form.
 - Promote transparency.
 - Maintain accurate records.
 - Investigate allegations promptly.
 - Protect whistleblowers.
 - Train employees.
 - Review this policy annually.
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5. Definition of Bribery

Bribery is offering, giving, requesting or accepting money, gifts, hospitality or any other advantage to improperly influence a business decision or gain an unfair advantage.

6. Definition of Corruption

Corruption includes dishonest or fraudulent conduct by anyone using their position for personal gain or to benefit another individual or organisation unlawfully.

7. Zero-Tolerance Commitment

The Company strictly prohibits:

- Cash payments.
 - Secret commissions.
 - Kickbacks.
 - Facilitation payments.
 - Undisclosed gifts.
 - Personal rewards.
 - Hidden discounts.
 - False invoices.
 - Bribes through third parties.
 - Any attempt to influence contracts improperly.
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8. Responsibilities of Directors

Directors shall:

- Lead by example.
 - Promote ethical behaviour.
 - Ensure compliance with legislation.
 - Investigate allegations.
 - Maintain adequate procedures.
 - Review risks annually.
 - Provide employee training.
 - Maintain policy records.
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9. Responsibilities of Employees

Employees must:

- Follow this policy.
 - Refuse bribes.
 - Declare conflicts of interest.
 - Report concerns immediately.
 - Complete required training.
 - Maintain accurate records.
 - Cooperate with investigations.
 - Never conceal wrongdoing.
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10. Gifts and Hospitality

Employees may only accept modest gifts or hospitality where they:

- Are lawful.
- Are proportionate.
- Are infrequent.
- Are openly declared.
- Do not influence decisions.
- Cannot be interpreted as a reward.

Cash gifts are never permitted.

11. Prohibited Conduct

Employees must never:

- Offer money for contracts.
 - Accept payments for preferential treatment.
 - Create false invoices.
 - Hide transactions.
 - Use Company funds improperly.
 - Authorise suspicious payments.
 - Offer gifts during tender processes.
 - Misrepresent Company accounts.
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12. Conflicts of Interest

Employees must disclose any personal, financial or family interests that may influence business decisions.

Failure to disclose conflicts may result in disciplinary action.

13. Procurement

The Company ensures procurement decisions are based upon:

- Quality
- Safety
- Competence
- Value for money
- Compliance
- Fair competition

No supplier shall receive preferential treatment through improper influence.

14. Financial Controls

The Company maintains:

- Accurate accounting records.
 - Authorised payment procedures.
 - Invoice verification.
 - Budget monitoring.
 - Audit trails.
 - Management approval for expenditure.
 - Secure banking arrangements.
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15. Reporting Concerns

Employees who suspect bribery or corruption must immediately report concerns to a Director.

Reports may be made confidentially.

No employee will suffer retaliation for reporting genuine concerns.

16. Investigation Procedure

All allegations will:

- Be treated confidentially.
 - Be investigated promptly.
 - Be documented.
 - Be reviewed fairly.
 - Result in appropriate action.
 - Be retained securely.
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17. Training

All employees receive information regarding:

- Bribery risks.
- Ethical behaviour.
- Reporting procedures.
- Company expectations.
- Legal responsibilities.

Training forms part of employee induction.

18. Monitoring

The Company will monitor:

- Supplier relationships.
- Financial transactions.
- Contract awards.
- Expense claims.
- Gifts declared.
- Policy compliance.

Internal reviews will be completed annually.

19. Breaches

Failure to comply may result in:

- Disciplinary action.
 - Removal from projects.
 - Contract termination.
 - Dismissal.
 - Civil proceedings.
 - Criminal prosecution where appropriate.
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20. Record Keeping

The Company maintains records of:

- Policy acknowledgements.
 - Training.
 - Investigations.
 - Gifts declared.
 - Supplier checks.
 - Financial approvals.
 - Annual reviews.
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21. Policy Communication

This policy is communicated to employees by:

- Employee induction.
- Company handbook.
- Email distribution.
- Toolbox talks.
- Director briefings.
- Annual refresher training.
- Company noticeboard where applicable.
- Electronic document storage.

Employees sign an acknowledgement confirming they have read, understood and agree to comply with this policy.

22. Policy Review

This policy shall be reviewed every 12 months or sooner if legislation changes, significant business changes occur or improvements are identified.

Statement of Intent – Anti-Bribery and Corruption Policy

Connect Skilled Contractor Service Ltd is committed to conducting all business activities with honesty, integrity, fairness and transparency. We operate a zero-tolerance approach to bribery and corruption and are committed to complying with the Bribery Act 2010 and all other applicable laws and regulations.

The Company prohibits the offering, giving, requesting or accepting of any bribe, kickback or other improper payment or benefit intended to influence a business decision or obtain an unfair advantage. This commitment applies to all directors, employees, agency workers, subcontractors, consultants and any person acting on behalf of the Company.

We are committed to maintaining effective procedures to prevent, detect and report bribery and corruption. All personnel are expected to act ethically, avoid conflicts of interest, maintain accurate records and report any suspected breaches immediately. Any breach of this policy may result in disciplinary action, termination of contracts and, where appropriate, referral to the relevant enforcement authorities.

This Statement of Intent demonstrates Connect Skilled Contractor Service Ltd's commitment to maintaining the highest standards of ethical business conduct and ensuring that all business is carried out lawfully, responsibly and with integrity.

Approved By:

Print Name ____Aleem_Aziz____

Director Name ____Aleem_Aziz____

Approved by: ____Director Aleem Aziz____

Signed by Aleem Aziz:_____

Date: ____26/07/2026____

