



## **Anti-Corruption & Bribery Policy**

### **Introduction**

It is the policy of Property Security Services (PSS) Ltd, trading as Propertysec to conduct business in an honest and ethical manner. As an organisation we have adopted a zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

Propertysec will uphold all relevant laws relevant to the promotion of fairness within the security sector and wider industry. We will conform fully to requirements of the United Kingdom's Bribery Act (2010), which applies to conduct both in the UK and overseas.

### **Scope**

This policy applies to all employees engaged by Propertysec, including those working on behalf of the company such as subcontractors and direct suppliers.

### **What is Bribery?**

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

- Giving or offering a bribe;
- Receiving or requesting a bribe; or
- Bribing a foreign public official.

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## Gifts & Hospitality

This policy does not prohibit normal and appropriate gifts and hospitality (given and received). However, we have specific internal policies and procedures which provide guidance to Workers as to what is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits, subject to the principles set out below (the **Overriding Principles**), namely that any gift or hospitality:

- Must not be made with the intention of improperly influencing an employee to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- Must comply with local law in all relevant countries
- Must be given in the name of the organisation, not in an individual's name
- Must not include cash or a cash equivalent
- Must be appropriate in the circumstances
- Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift

## What Is Not Acceptable?

It is not acceptable for any Worker (or someone on their behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or the Firm will improperly be given a business advantage, or as a reward for a business advantage already improperly given
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure

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- Accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage
- Accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by the company in return
- Threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

### **Facilitation Payments And “Kickbacks”**

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

### **Charitable Donations And Sponsorship**

Propertysec only makes charitable donations and provides sponsorship that are legal and ethical under local laws and practices and which are in accordance with the company's internal policies and procedures.

### **Record keeping**

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

### **Responsibilities And Raising Concerns**

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy

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Employees are required to notify the company as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee

### **Training And Communication**

Training on this policy is provided for all employees as part of their initial induction and when policy updates are implemented. Our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, and contractors.

### **Monitoring and review**

Propertysec monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance that they are effective in countering any risks of bribery and corruption.

All employees are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

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