

Anti Bribery and Anti Corruption Policy

Full policy | POL-06 | Version 2026.10.23

Reviewed and approved 23 October 2026 | Approved by the Managing Director

Prevent improper influence in winning work, choosing contractors, buying supplies and checking or approving work.

1 Purpose and scope

We conduct business honestly and do not use money, gifts, favours or personal connections to secure an improper advantage. This policy applies to our work in the United Kingdom and to any activity carried out for us overseas. A third party must not do on our behalf something we prohibit ourselves.

It covers sales, tenders, purchasing, recruitment, subcontracting, inspections, sign-off, payments and dealings with public officials. The rules apply to benefits given to relatives, charities or other intermediaries as well as benefits given directly to a decision-maker.

2 Responsibilities

The directors have overall responsibility. The Managing Director maintains the policy, risk assessment and document control. The Operations Director applies the controls to contractors, suppliers and site operations. They provide proportionate training and review concerns and corrective actions.

Anyone who selects a supplier, approves work or authorises expenditure must identify conflicts and follow these rules. A director must not approve their own gift, hospitality or conflict; the other director makes and records that decision. Contractors are responsible for briefing their own teams.

3 Prohibited conduct

A bribe is a financial or other advantage offered, promised, given, requested or accepted to induce or reward improper conduct. Bribery of a foreign public official is also prohibited. Examples include paying for a contract award, taking a personal commission from a supplier, offering a job in exchange for favourable treatment or paying someone to pass work that has failed inspection.

We prohibit kickbacks, concealed commissions, false expenses and unofficial payments to speed up routine duties. An official published fee for a legitimate service may be paid through the normal documented approval process. Its legality and purpose must be clear.

If a threat to life, health or liberty makes a payment unavoidable, personal safety takes priority. Report the circumstances as soon as it is safe and record them accurately. This is not permission to make routine facilitation payments.

4 Gifts hospitality and donations

Reasonable business hospitality must have a legitimate purpose, be proportionate and transparent, comply with the recipient organisation's rules and create no obligation to favour either party. Cash, cash equivalents, personal loans, secret gifts and benefits intended to influence a decision are prohibited.

Declare offers and receipts to a director, including anything refused because of a concern. Written approval is required before offering or accepting a personal gift, entertainment or hospitality beyond ordinary modest refreshments. No monetary limit is invented by this policy. A director considers value, frequency, timing, the recipient and the business purpose.

Do not offer or accept benefits during a tender, contractor selection, inspection, disputed invoice or other sensitive decision where they could compromise impartiality. If returning an unsolicited item is impractical, a director records its disposal or other appropriate treatment.

Company charitable donations or sponsorship require director approval and a genuine documented purpose. They must never be a route to influence a contract or official. No company political contribution may be made under this policy.

5 Risk assessment and due diligence

The directors assess bribery risks when entering a new relationship, changing services or receiving a warning sign, and at annual management review. Particular attention is paid to personal referrals, unexplained fees, intermediaries, public procurement and requests for off-record payments.

Checks must be proportionate to the risk and include the identity of the counterparty, the service actually provided, relevant ownership or personal connections and any credible concerns. Record the assessment and resolve material concerns before appointment or payment. Requirements are communicated through OP-CON, induction and the agreement with the contractor or supplier. A policy alone does not establish that adequate prevention procedures operate.

6 Payments conflicts and records

Use genuine quotations, invoices and evidence of delivery. Record transactions accurately in the accounts system and supporting company records. Do not split payments to avoid approval or use a personal account to conceal a transaction. Independently verify unusual bank-detail changes through a known contact.

Declare a personal, family or financial interest in a client, applicant, supplier or contractor before participating in a decision. The directors decide whether to remove the person from the decision or apply another documented control.

Keep the decision, approval and relevant evidence in the existing QMS or financial records with access appropriate to their sensitivity. Sensitive allegations must not be placed in general site chats. Retain financial records for the applicable six-year accounting period and other records under QM-01 section 9.4, subject to a documented investigation or legal hold.

7 Concerns investigation and protection

Report a suspected breach promptly and privately to a director. Record facts and preserve documents already available; do not confront suspects, make covert payments or conduct an unauthorised investigation. Report to the other director if one is implicated. External reporting to police or an appropriate regulator remains available.

The director receiving the concern assesses immediate risks, preserves evidence and arranges a fair investigation without a conflict of interest. Confidentiality is limited to those who need the information; absolute secrecy cannot be promised. Specialist advice and reporting to the authorities are considered where appropriate.

No person will suffer detriment for refusing bribery or raising a reasonable concern, including a concern that is not substantiated. Employees are dealt with through a fair disciplinary process; contractor breaches are addressed under the applicable agreement and may lead to suspension or termination.

8 Training monitoring and review

Provide induction guidance to those covered and additional practical training to people involved in tenders, purchasing, contractor approval and payments. Record training and refresh it when risks, roles or the law change.

At annual management review, examine gifts and hospitality decisions, conflicts, payment exceptions, concerns and the effectiveness of corrective actions. Record an owner and due date for improvements. The QMS owner controls revisions and communicates relevant changes.

Policy enquiries: compliance@soniclean.co.uk | 0114 437 2337

Reviewed and approved by the Managing Director on 23 October 2026.

Next review 23 October 2027, or earlier if the law, risks or working arrangements change.