

ANTI-BRIBERY AND CORRUPTION POLICY

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1. POLICY STATEMENT

1.1 2012 Security Ltd has zero tolerance for bribery and corruption. The Company will act honestly, fairly and with integrity and will maintain proportionate procedures designed to prevent bribery by employees and persons who perform services for or on behalf of the Company.

2. SCOPE

2.1 The policy applies to directors, employees, workers, agency personnel, contractors, consultants, agents, suppliers, subcontractors and other associated persons. It applies to conduct in the UK and overseas where the Bribery Act 2010 applies.

3. PROHIBITED CONDUCT

- Offering, promising or giving a financial or other advantage to induce or reward improper performance.
- Requesting, agreeing to receive or accepting an advantage in connection with improper performance.
- Bribing a foreign public official.
- Using an associated person, intermediary, supplier or subcontractor to do something that the Company would not be permitted to do directly.
- Making facilitation or "grease" payments to secure or accelerate routine official action.
- Creating false, misleading or off-book records to conceal a payment, gift, commission or benefit.

NO BUSINESS IS WORTH A BRIBE

No employee or associated person will be criticised for losing business or refusing an instruction because they declined to pay, receive or facilitate a bribe.

4. GIFTS, HOSPITALITY AND EXPENSES

4.1 Reasonable, proportionate and transparent hospitality or gifts may be permitted where they are lawful, not intended to influence a decision improperly, not cash or a cash equivalent, and are approved/recorded in accordance with Company rules. Extra care is required for public officials, tender periods, contract awards, renewals, complaints, inspections and procurement decisions.

4.2 Any gift or hospitality that could reasonably create an obligation, conflict of interest or appearance of improper influence must be refused or referred to a Director before acceptance.

5. PREVENTION PROCEDURES

- Top-level commitment and a clear tone from management.
- Periodic bribery risk assessment, including clients, procurement, subcontracting, tenders and intermediaries.
- Risk-based due diligence on suppliers, agents, subcontractors and other associated persons.
- Clear contractual obligations and rights to act on suspected bribery.
- Training and communication proportionate to role and risk.
- Accurate financial records, approvals and monitoring.
- Periodic review after incidents, business changes or new risks.

6. REPORTING

6.1 Suspected bribery, requests for improper payments or conflicts of interest must be reported promptly to a Director or through the Whistleblowing and Reporting Concerns Policy. A non-conflicted route must be used where the normal recipient is implicated. Retaliation for a genuine report or refusal to participate in bribery is prohibited.

7. INVESTIGATION AND SANCTIONS

7.1 The Company will preserve relevant records and investigate fairly. Matters may be referred to the police, Serious Fraud Office, National Crime Agency or another authority where appropriate. Employees may face disciplinary action up to dismissal and associated persons may have contracts suspended or terminated.

8. RECORD KEEPING

8.1 Accounts, invoices, expenses, gifts/hospitality records and third-party payments must be accurate and complete. No fund, account or description may be used to hide the true purpose of a payment.

9. REFERENCES

- Bribery Act 2010
- Ministry of Justice Bribery Act guidance, including the six prevention principles
- Whistleblowing and Reporting Concerns Policy
- Tax Evasion Facilitation Prevention Policy

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