



## Anti-Bribery Policy for the Offering and Acceptance of Bribes

Chigwell London Ltd values its reputation for responsible behaviour and for executing its business in an ethical and professional manner. It recognises that bribery undermines democracy and the rule of law and poses very serious threats to sustained economic progress and that involvement in bribery will ultimately reflect adversely on its image and reputation.

Chigwell's aim therefore is to limit exposure to bribery by:

- Defining a clear anti-bribery policy as set out below
- Educating and training all employees through the use of presentations and seminars so that they can recognise and avoid all involvement in the act of bribery
- Encouraging individuals to be vigilant and to report any suspicion of bribery, providing employees with suitable channels of communication and ensuring sensitive information is dealt with in the strictest confidence
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities
- Taking firm and vigorous action against any individual(s) involved in bribery

### The Policy

Chigwell London Ltd prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other enticement to or from any person or company, wherever they are located and whether they are a public official or body or private person or company by any individual employee, agent or other person or body acting on Chigwell's behalf in order to gain any commercial, contractual or regulatory advantage for Chigwell London Ltd in a way which is unethical or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

### Further Clarification

Chigwell London Ltd recognises that its business varies across the markets in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of Chigwell London Ltd or of the person or body employing them or whom they represent.

Chigwell Construction's Anti-Bribery Policy is not designed to prohibit the following practices providing they are customary, are proportionate and are properly recorded:

- normal and appropriate bona fide hospitality providing it is reasonable and proportionate
- the giving of a ceremonial gift on a festival or at another special time such as Christmas
- the offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only



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If any individual is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the employee's senior manager before proceeding.

### **Employee Responsibility**

The prevention, detection and reporting of bribery is the responsibility of all employees throughout Chigwell London Ltd. Employees can report any suspicion of bribery in confidence by contacting their line manager.

**Dean Floyd, Managing Director**

Review Date: **1st January 2019**

Next Review: **1st January 2020**