

Anti-Bribery and Corruption Policy

Confined Space Group Ltd



1. Purpose

Confined Space Group Ltd is committed to conducting all business activities with integrity, transparency and professionalism. This policy sets out our zero-tolerance approach to bribery and corruption and ensures compliance with the Bribery Act 2010 and current UK anti-corruption standards.

2. Scope

This policy applies to:

- All employees, associates and agency personnel
- All contractors and subcontractors
- Self-employed firefighters and safety personnel representing CSG
- Any individual acting on behalf of Confined Space Group Ltd

It covers all business activities, including procurement, client engagement, operational delivery and safety-critical work.

3. Legal & Regulatory Framework

This policy complies with:

- Bribery Act 2010 – including offences of offering, giving, receiving or requesting a bribe, bribing a foreign public official, and failure of a commercial organisation to prevent bribery.
- UK Anti-Corruption Strategy (2023–2025 updates) – strengthening expectations for transparency and corporate accountability.
- Proceeds of Crime Act 2002 – relating to financial misconduct and improper gains.
- ISO 37001 Anti-Bribery Management Systems – recognised international best practice.

Under the Bribery Act, CSG can be held criminally liable if a person associated with the company commits bribery on our behalf.

4. Policy Statement

- Confined Space Group Ltd has a zero tolerance approach to bribery and corruption. We will:
- Conduct all business honestly and ethically
- Never offer, request or accept bribes
- Maintain transparent financial and operational records
- Take immediate action against any breach of this policy
- No employee or contractor will ever be penalised for refusing to engage in bribery, even if doing so results in loss of business.
- Must refuse any bribe offered to them and report the incident to management.
- Must ensure all dealings are transparent and conducted with integrity.

5. Definitions

Bribery

Offering, giving, receiving or requesting anything of value to improperly influence a decision or gain an unfair advantage.

Corruption

Abuse of entrusted power for private gain, including fraud, extortion, kickbacks, facilitation payments or conflicts of interest.

6. Responsibilities

6.1 Responsibilities of All Personnel

All individuals representing CSG must:

- Never offer, promise or give a bribe
- Never request, agree to receive or accept a bribe
- Refuse any bribe offered and report it immediately
- Conduct all dealings honestly, transparently and professionally
- Declare any potential conflicts of interest
- Follow all reporting and record-keeping requirements

6.2 Management Responsibilities

Management will:

- Ensure all personnel understand and comply with this policy
- Provide training and resources to prevent bribery and corruption
- Conduct due diligence on suppliers, subcontractors and partners
- Monitor business activities for risk indicators
- Report suspected criminal activity to the appropriate authorities
- Take disciplinary action where breaches occur

7. Procedures

7.1 Risk Assessment

- Conduct regular assessments to identify areas vulnerable to bribery or corruption
- Implement controls to mitigate identified risks
- Review risks annually or following significant operational changes

7.2 Training & Communication

- Provide mandatory anti-bribery training for all employees and contractors
- Communicate policy updates and legal changes promptly
- Ensure subcontractors and agency workers receive appropriate guidance

7.3 Reporting & Investigation

CSG encourages open reporting without fear of retaliation.

- Concerns may be raised confidentially to management
- All reports will be investigated promptly and impartially
- Findings will be documented and acted upon
- Where required, incidents will be reported to law enforcement or regulatory bodies

7.4 Record Keeping

- Maintain accurate and transparent financial records
- Retain documentation for all payments, gifts, hospitality and expenses
- Ensure all records comply with legal and audit requirements

8. Gifts, Hospitality & Donations

To prevent improper influence:

- Gifts or hospitality must never be offered or accepted if they could influence a business decision
- All gifts or hospitality above a nominal value must be declared
- Charitable donations must be transparent and approved by management
- Political donations are strictly prohibited

9. Consequences of Non-Compliance

Breaches of this policy may result in:

- Disciplinary action, including termination of employment or contract
- Removal from CSG approved contractor lists
- Criminal prosecution under the Bribery Act 2010
- Unlimited fines and/or imprisonment
- Serious reputational damage to the company

10. Continuous Improvement

Confined Space Group Ltd is committed to:

- Reviewing this policy annually
- Updating procedures in line with legislative changes
- Strengthening internal controls and due diligence processes
- Encouraging feedback to improve effectiveness

Authorisation

Policy adopted and agreed for Confined Space Group Ltd:

Tony Bowman

Managing Director

Date: 1st June 2026

Signed: Tony Bowman