

**PROJECT SOLUTIONS
ANTI-BRIBERY AND CORRUPTION POLICY**



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Unit E

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PROJECT SOLUTIONS

ANTI BRIBERY AND CORRUPTION POLICY

Introduction

Organisation Description

Project Solutions provides cost effective services to industrial, commercial, retail, and public-sector clients. Project Solutions design, manufacture, supply and install a diverse range of products through our core services, resin flooring, polished concrete, industrial painting and hygienic wall systems, primarily but not exclusively in the UK.

Project Solutions values its reputation and is committed to maintaining the highest level of ethical standards in how it conducts business. The actions of the company's employees at all levels and any others acting on the company's behalf are key to maintaining these standards.

Project Solutions acts with the highest standards of integrity and honesty in all it does; adherence to best practice governance, controls and compliance are essential to the running of the company and thereby helping customers to have confidence when entrusting their business in us.

This policy sets out Project Solutions stance on the implementation and management of anti-bribery and corruption measures across the company in accordance with our Ethical Code of Business Conduct and the UK Bribery Act 2010.

The Bribery Act 2010, which became effective from July 2011, introduced new and more onerous requirements in respect of the ways in which businesses should conduct themselves.

Project Solutions recognises that bribery and corruption have an adverse effect on communities wherever they occur and is committed to enforcing high moral and ethical standards in all business activities, as defined in the company Ethical Code of Business Conduct, which outlines the requirements to which all businesses are required to comply and forms an integral part of this policy.

2. Purpose

The purpose of this policy is to set out Project Solutions responsibilities in observing and upholding its position on bribery and corruption; and to provide information and guidance on how to recognise and deal with bribery and corruption issues. This policy applies to all businesses and to all staff (i.e. employees full time and part time; temporary; seconded; contract personnel of the business and non-executive Directors). Employees (whether permanent, fixed-term or temporary), consultants, contractors, casual workers and agency staff, agents, or any other person associated with the company. Third party means any individual or organisation Project Solutions comes into contact with during the course of business.

PROJECT SOLUTIONS

ANTI BRIBERY AND CORRUPTION POLICY

3. Summary of UK Legislation

The main piece of legislation in the UK is the Bribery Act 2010.

The key offences are those of:

- active bribery
- passive bribery
- bribing a foreign public official
- a commercial organisation failing to prevent active bribery by its employees, agents, or subsidiaries.

4. What is bribery and corruption?

A bribe is an inducement or reward offered, promised, or provided in order to gain commercial, contractual, regulatory or personal advantage.

Perceived risks (not exhaustive) relate to inducements or rewards offered, received, promised, or provided to:

- those responsible for buying to encourage purchases from given manufacturers or agents.
- those responsible for making decisions in relation to contracts for goods and services.
- those responsible for managing or awarding contracts subject to tender.
- any employee regarding the release of commercially sensitive information to a third party.
- the sales teams to secure the custom of a particular retailer or contractor.
- Current controls and systems include:
 - directors and the senior management team approval for credit facilities above pre-determined levels.
 - pre-set guidance on the level of selling price discounts inclusive of compliance checks.
 - regular commercial and financial review by the finance department and directors
 - directors and senior management team approval in relation to budgetary control and approved suppliers.
 - transparency and recorded disclosure of corporate hospitality, both given and received.

5. Hospitality and Gifts

This policy does not prohibit normal and appropriate hospitality and the giving of gifts, however:

- it should not be given with the intention of influencing a third party 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.
- local laws must be complied with.
- it is given in the name of the operating business.
- it does not include cash.
- it is appropriate in type and value in the circumstances, and
- it is openly done with the relevant line manager informed of the receipt or of the giving.

PROJECT SOLUTIONS

ANTI BRIBERY AND CORRUPTION POLICY

6. Facilitation Payments

Project Solutions prohibits 'facilitation' or 'grease' payments as these are bribes and illegal. Facilitation payments are commonly small payments made to secure or speed up routine actions; usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. It is also our policy that we work to ensure that our agents and other intermediaries; joint ventures and consortia, contractors and suppliers do not make facilitation payments on our behalf. If you have doubts about a payment and suspect that it might be considered a facilitation payment; only make the payment if the official or third party can provide a formal receipt or written confirmation of its legality. If practicable, obtain senior management/legal approval for the payment. If the demand is accompanied by immediate threat of physical harm then put safety first; make the payment and report immediately to senior management, the circumstances and amount of the payment made 'under duress'.

7. How do I know if something is a bribe?

In most circumstances, common sense will determine when a bribe is being offered. However, here are some questions you should ask yourself if in doubt:

- am I being asked to pay something or provide any other benefit over and above the cost of the services being performed, for an example an excessive commission, a lavish gift, a kickback or make a contribution to a charity or political organisation?
- am I being asked to make a payment for services to someone other than the service provider?
- are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed to disclose them?
- when a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favourable treatment, to undermine an impartial decision-making process or to persuade someone to do something that would not be in the proper performance of their job

8. Whistleblowing

Project Solutions is committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If you suspect or observe anything that you think might be in contravention of this policy, you have an obligation to report it. You should raise your concerns with your immediate line manager in the first instance. Project Solutions will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper, unethical or inappropriate behaviour. All reports will be treated confidentially.

PROJECT SOLUTIONS

ANTI BRIBERY AND CORRUPTION POLICY

9. Charitable Donations

Charitable Donations are permitted only to registered (non-profit) charities. No charitable donations may be given to any organisation which is not a registered charity. Charitable donations shall not be used as a substitute for political payments. All charitable donations must be fully recorded and authorised by a Main Board Director before the donation is made. Proof of receipt of all charitable donations must be obtained from the recipient charity. Under no circumstances may charitable donations be made in cash. No charitable donation may be made at the request of any party where that donation may result in improper conduct.

10. Staff Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Project Solutions or under its control. All staff are required to avoid activity that breaches this policy.

You must:

- Ensure that you read, understand and comply with this policy
- Raise concerns as soon as possible; if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

As well as the possibility of civil and criminal prosecution, employees that breach this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

Project Solutions defines bribery and corruption in accordance with the following definitions from Transparency International:

Bribery: *"The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, etc)."*

Corruption: *"The abuse of entrusted power for private gain."*

Facilitation Payments: *"A small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement."*

Getting help

If you are unsure about your obligations under this policy, you should contact one of the following people for help:

- in the first instance, your line manager; or
- a member of the SMT (Senior Management Team)

PROJECT SOLUTIONS ANTI BRIBERY AND CORRUPTION POLICY

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	DW	15.05.2017
2	Review	DW	25.04.2018
3	Review	DW	15.03.2019
4	Review	DW	20.11.2020
5	Annual Review	DW	15.11.2021
6	Annual Review	DW	16.12.2022
7	Annual Review	CW	02/11/2023
8	New Logo & Company Name	DW	15/05/24

Signed: _____



Darren Watkins, Managing Director

Date: 15/05/2024