Anti-Bribery & Anti-Corruption Policy

Date	Author	Summary of Changes
23/10/2023	NATPOT	2023 review – updated job roles to current
02/05/2024	ROXPAL	Table of changes added to policy
27/09/2024	CARBOO	Logo Updated
22/10/2024	NATPOT	Annual review
11/09/2025	KATGOD	Job Titles amended. Head of HR Compliance to Director. Chief Operations Officer now Operations Director.
22/10/2025	NATPOT	Annual review. Content amended to reflect the group.
14/10/2026	NATPOT	Annual review. Competition law compliance added.

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1. What does your policy cover?

This anti-bribery policy exists to set out the responsibilities of Churches Fire & Security Ltd, the Group companies, and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for Churches Fire & Security Ltd (Churches, Group Companies or The Company). It helps them recognise and deal with bribery and corruption issues, as well as understanding their responsibilities.

Compliance Director / HR duties shall be covered by the Operations Director or in their absence the Chief Executive Officer.

2. Policy Statement

The Company is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Churches has a zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

The Company will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

The Company recognises that bribery and corruption are punishable by up to ten years of imprisonment and an unlimited fine.

If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we are committed to preventing bribery and corruption in our business and take our legal responsibilities seriously.

3. Who is covered by the policy?

This anti-bribery and corruption policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public

bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4. Definition of bribery and corruption

Under the Bribery Act 2010 a bribe is defined as 'where a person offers, promises or gives financial or other advantage to another person'. And the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's Compliance Director.

Corruption is dishonesty, fraudulent conduct, or illegal behaviour, this includes abuse or misuse of entrusted power for personal gain.

5. What is and what is NOT acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality
- Facilitation or 'grease' payments
- Political contributions
- Charitable contributions

5.1. Gifts and hospitality

The Company accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

a) It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
b) It is not made with the suggestion that a return favour is expected.
c) It is in compliance with local law.
d) It is given in the name of the company, not in an individual's name.

e) It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
f) It is appropriate for the circumstances (e.g. giving small gifts or as a small thank you to a company for helping with a large project upon completion).
g) It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
h) It is given / received openly, not secretly. All gifts, of any variety must be registered with the HR Department who will keep a gifting register.
i) It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
j) It is not above a certain excessive value, as pre-determined by the company's TopCo management (usually in excess of £100).
k) It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Compliance Director or HR Director.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the HR Department, who will assess the circumstances.

The Company recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed by completing the **'Gift Register Form'** on the Churches intranet or logging with HR or Compliance. Gifts from suppliers should always be disclosed on the form. HR will receive an alert and inform the Chief Executive Officer who will have ultimate sign off on the receipt of all gifts by The Company.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Compliance Director or HR Director should be sought.

During the months of October to the end of December, all gifts received by any department in the business units within The Company, including gifts that are named for specific individuals, are collected and put into a prize draw for all colleagues within that business unit. Gifts will then be sent to the prize draw winners and details of those winners published within that business unit.

5.2. Facilitation (grease) Payments and Kickbacks

5.2.1. The Company does not accept and will not make any form of facilitation payments, sometime referred to as grease payments, of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

5.2.2. The Company does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.2.3. The Company recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your line manager.

5.3. Political Contributions

The Company will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

5.4. Charitable Contributions

5.4.1 The Company accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

5.4.2 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

5.4.3 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the TopCo.

6. Competition Law Compliance

6.1 The organisation is committed to conducting business ethically, fairly and in compliance with all applicable competition legislation, including the Competition Act 1998. We recognise that anti-competitive behaviour, such as price-fixing, bid-rigging, market-sharing arrangements and the exchange of commercially sensitive information with competitors, can undermine fair competition and expose both the business and individuals to significant legal, financial and reputational consequences.

6.2 Competition law compliance forms part of our broader commitment to ethical business conduct and anti-bribery controls. By promoting transparency, fair tendering practices and responsible engagement with customers, suppliers and competitors, the organisation seeks to maintain a culture of integrity and lawful competition across all business activities.

6.3Arrangements that are in place to detect and avoid anti-competitive behaviour include distribution of the policy and recording receipt and understanding by all employee; ensuring the policy is updated annually and determines that employees are required to comply and breaches may include disciplinary action; employees are required to immediately report any suspected anti-competitive behaviour or inappropriate approaches from competitors. Records will be maintained if these incidences occur.

7. Employee Responsibilities

1) As an employee of The Company, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

3) All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption.

4) They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

5) If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Compliance Director or HR department.

6) If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The Company has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy, engaging in bribery, giving or receiving bribes is considered to be a gross misconduct offence.

8. What happens if I need to raise a concern?

This section of the policy covers 3 areas:

a) How to raise a concern
b) What to do if you are a victim of bribery or corruption
c) Protection

7.1 How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to The Company, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the Compliance Director, the HR Director, or the Chief Executive Officer.

The Company will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

7.2 What to do if you are a victim of bribery or corruption

You must tell the Compliance Director or HR Director as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7.3 Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, The Company understands that you may feel worried about potential repercussions. The Company will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

The Company will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, the HR Director or the Compliance Director immediately.

8. Training and Communication

The Company will make this policy available to all at all times, communicating any amendments immediately.

The Company's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

The Company will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced.

As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

9. Record Keeping

The Company will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and

keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

10. Monitoring and Review

The Company's Compliance Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to audits to ensure that they are effective in practice including annual audits by external financial auditors.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Compliance Director.

This policy does not form part of an employee's contract of employment and The Company may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

Signed:
Position: Director of Compliance and HSE
Date: 14/10/2026