



# BRIBERY POLICY

## **Policy Statement**

G&L Consultancy Ltd does not tolerate acts of bribery under any circumstances in order to get or keep business or falsify results. We are committed to carrying out business fairly, openly and honestly.

This covers the offering, promising or giving a bribe (active bribery) as well as requesting, agreeing to receive or accepting a bribe (passive bribery).

G&L Consultancy Ltd has adopted the recommendations and guidance of the Bribery Act 2010 in order to ensure that all employees are fully aware of this company policy and how to fully comply with it.

Hospitality and promotional or other business expenditure which seeks to improve the image of the company, or to establish cordial relations with existing or potential clients, is recognised as an established and important part of doing business and is not prevented as part of this bribery policy.

It is the responsibility of every employee to assist the Company in meeting this commitment, for this reason, acceptance of and adherence to the Company's Bribery Policy forms part of every employee's contract of employment.

## **Bribery Act Principals and Application**

### Proportionality

Based on the Bribery Act 2010 action has been taken within G&L Consultancy which is proportionate to the size of the company and the risks of bribery being used within or towards the company.

### Top Level Commitment

This Bribery Policy has been produced by the Managing Director and discussed at the management level and signed by all managers to signify their agreement to it. The Policy has been communicated to all staff members who have also signed in agreement to it.

## MANAGEMENT POLICY

### BRIBERY POLICY

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#### Risk Assessment

Based on the size and nature of G&L Consultancy Ltd it has been assessed that the risks of potential bribery may result from the following circumstance:

- Bribery of G&L site air monitoring analysts to influence the outcome of site clearance testing.
- Bribery of G&L site surveying personnel to influence the outcome of asbestos location surveys.
- Bribery of G&L laboratory analysts to influence the outcome of asbestos analytical work.
- Bribery of external clients to enable G&L to win tenders / large contracts.
- Bribery of G&L Staff to ensure certain clients get awarded asbestos removal contracts as part of asbestos management projects.

#### Due Diligence

Due diligence must be carried out on an ongoing basis to quickly identify any potential cases of bribery. If a particular member of staff is always requested by a certain client, if any unusual results are identified or if certain analysts have a substantially higher pass rate on-site work than other analysts, additional investigations will be initiated.

#### Communication

This policy is issued to all staff by means of email and each person is required to read and sign a master copy in the presence of a Manager or Director. All members of staff are made aware that any breaches of this policy will be classed as gross misconduct.

The policy will also be displayed on the notice board in the main office.

#### Monitoring and Review

The policy will be reviewed each year at the management level and updated as necessary.

The policy will be reissued to all staff on an annual basis after its review to ensure that everyone is regularly reminded of the importance the company places on any form of bribery.

This policy has been endorsed by Julie Lewis and has the full support of the management team.

The policy was reviewed and approved on 16<sup>th</sup> January 2023 following consultation with senior managers and workers.

## MANAGEMENT POLICY

## BRIBERY POLICY

Overall responsibility for the effectiveness of the policy lies with Julie Lewis, Quality Director. For more information, please contact this person: 01823 443 898

Director	Name	Signature	Date
Quality Director	Julie Lewis	<i>Julie Lewis</i>	16 <sup>th</sup> Jan 2023
Technical Director	Paul Lewis	<i>Paul Lewis</i>	16 <sup>th</sup> Jan 2023
Somerset Office	Name	Signature	Date
Health, Safety and Quality Manager	Mark Skinner	<i>Mark Skinner</i>	16 <sup>th</sup> Jan 2023
Operations Manager	Darren Alway	<i>Darren Alway</i>	16 <sup>th</sup> Jan 2023
Client Liaison Manager	James Ooyman	<i>James Ooyman</i>	16 <sup>th</sup> Jan 2023
Wages, Personnel and Accounts Manager	Sally Monger	<i>Sally Monger</i>	16 <sup>th</sup> Jan 2023
Air Test & Removals Manager	Jason Monger	<i>Jason Monger</i>	16 <sup>th</sup> Jan 2023
Survey Manager	Jo Haigh	<i>Jo Haigh</i>	16 <sup>th</sup> Jan 2023
Northern Ireland Office	Name	Signature	Date
Northern Ireland Director	Alan Lewis	<i>Alan Lewis</i>	16 <sup>th</sup> Jan 2023
Office Manager	Karen Lewis	<i>Karen Lewis</i>	16 <sup>th</sup> Jan 2023
Lab Manager	Colin Webb	<i>Colin Webb</i>	16 <sup>th</sup> Jan 2023
Deputy NI Branch Manager	John McAleenan	<i>John McAleenan</i>	16 <sup>th</sup> Jan 2023