



Atlas Electrical & Security Ltd

Anti- Corruption Policy

Version 2.0

Policy Owner	Stephen Norton
Compliance Manager	James Whitcher
Date Policy Agreed	July 2025 (Version 1) July 2026 (Version 2)
Review Date	July 2027

Atlas Electrical & Security Ltd

Registered Address Unit 2, Victoria Mill Business Park, Wharf Road, Doncaster, South Yorkshire, DN1 2ST

VAT Registration Number GB 175 3645 88

Registered in England & Wales No. 11548394

01302 400 218

www.atlassecurity.services

Atlas Electrical & Security Ltd

Anti-Bribery & Anti-Corruption Policy

1. Policy Statement

Atlas Electrical & Security Ltd is committed to conducting all business activities with integrity, transparency and professionalism. The Company operates a zero-tolerance approach to bribery, corruption, fraud and unethical business practices. All employees, directors, contractors, consultants and third parties acting on behalf of the Company are required to always comply with this policy and the requirements of the Bribery Act 2010.

2. Scope

This policy applies to all employees, directors, agency workers, contractors, consultants, subcontractors, suppliers, business partners, agents and any other persons acting on behalf of the Company.

3. Leadership Commitment

The Managing Director and senior management team are responsible for promoting a culture of integrity and ensuring that adequate procedures are implemented to prevent bribery and corruption throughout the organisation.

4. Definitions

Bribery is the offering, promising, giving, requesting, agreeing to receive or accepting of any financial or other advantage intended to induce improper performance of a function or activity. Corruption includes any abuse of entrusted power for private gain.

5. Gifts and Hospitality

Gifts, hospitality or entertainment must be modest, proportionate and reasonable. Gifts up to £25 require no prior approval but must still comply with this policy and be declared where received from customers, suppliers or business partners; £25–£100 require manager approval; over £100 require written approval from the Compliance Manager or Managing Director; over £250 are prohibited unless exceptional circumstances exist and Director approval is obtained. All gifts and hospitality must be declared by the recipient and recorded in the Company's Gifts and Hospitality Register. The Compliance Manager shall maintain and review the register on at least a quarterly basis.

6. Facilitation Payments and Kickbacks

The Company prohibits all facilitation payments and kickbacks. Any demand for such payments must be reported immediately. Where personal safety is at risk, employees should prioritise safety, keep payments to a minimum, obtain a receipt where possible and report the incident immediately.

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7. Dealings with Public Officials

Employees must not offer, promise, authorise or provide any gift, hospitality, payment, donation or other advantage to any public official, government representative, regulatory authority or local authority employee where such action could influence, or be perceived to influence, an official decision.

Any interaction involving gifts or hospitality to public officials must receive prior written approval from the Managing Director.

8. Conflicts of Interest

Employees must declare any personal, family or financial interests that could influence, or appear to influence, business decisions. Failure to disclose a conflict of interest may be treated as gross misconduct.

9. Third-Party Due Diligence

Appropriate due diligence will be conducted before engaging agents, consultants, subcontractors or strategic suppliers. This may include identity verification, company registration checks, sanctions screening, reputation checks and confirmation of anti-bribery compliance.

10. Reporting Concerns

Any employee who becomes aware of, suspects, witnesses or is asked to participate in conduct that may constitute bribery, corruption, fraud or unethical business practices must report the matter immediately. Failure to report a known or suspected breach may itself constitute a disciplinary offence.

11. Investigation of Allegations

All allegations will be investigated promptly and confidentially. Employees are required to cooperate fully. Attempts to conceal evidence, provide misleading information or obstruct an investigation may constitute gross misconduct.

12. Protection for Reporting Concerns

The Company prohibits retaliation against any person who raises a concern in good faith. Any employee found to have retaliated against an individual who reports a concern, participates in an investigation or refuses to engage in bribery or corruption will be subject to disciplinary action up to and including dismissal.

13. Procurement and Contract Awards

Employees must not offer, promise or provide any gift, payment, commission or inducement intended to influence tender evaluations, contract awards, procurement decisions, site acceptance decisions or contract renewals.

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14. Record Keeping

All transactions, gifts, hospitality, donations and expenses must be accurately recorded and supported by appropriate documentation. False, misleading or incomplete records are prohibited.

15. Gross Misconduct

Offering or accepting a bribe, concealing corruption, falsifying records, failing to disclose conflicts of interest, retaliating against whistleblowers or deliberately failing to report known breaches may be treated as gross misconduct and may result in summary dismissal.

16. Monitoring and Review

This policy will be reviewed at least annually and whenever significant legal, regulatory or organisational changes occur.

17. Training

All employees will receive anti-bribery and anti-corruption awareness training during induction.

Additional training will be provided where roles present increased exposure to bribery risks.

Training records will be retained by the Company.

18. Related Policies

This policy should be read in conjunction with:

- Whistleblowing Policy
- Disciplinary Policy
- Code of Conduct
- Procurement Policy
- Expenses Policy
- Fraud Prevention Policy

Signature: Stephen Norton

Position: Managing Director

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