

## **Ace Fire & Security Systems Ltd - Anti Bribery Policy**

### **Policy statement**

ACE conducts all business in an honest and ethical manner. As part of that, we take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever we operate.

### **Purpose**

The company will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010, which applies to conduct both in the UK and abroad.

### **Scope and applicability**

This policy applies to all individuals working for or on behalf of ACE, at all levels, whether permanent, fixed-term or temporary, and wherever located, including consultants, contractors, agency staff and any other person who performs services for or on behalf of ACE.

### **What is bribery?**

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

giving or offering a bribe;

receiving or requesting a bribe; or

bribing a foreign public official.

ACE may also be liable under the Act if it fails to prevent bribery by an associated person for the Company benefit.

### **Gifts and hospitality**

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, we have specific internal policies and procedures which provide guidance to our people as to what is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits, subject to the principles set out below, namely that any gift or hospitality:

- must not be made with the intention of improperly influencing a Third Party or Worker 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;
- must comply with local law in all relevant countries;
- must be given in the name of the organisation, not in an individual's name;
- must not include cash or a cash equivalent;

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- must be appropriate in the circumstances;
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
- must be given openly, not secretly; and in the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties.

### What is not acceptable?

It is not acceptable for any Worker (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or ACE will improperly be given a business advantage, or as a reward for a business advantage already improperly given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure;
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by ACE in return;
- threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

### Charitable Donations

ACE only makes charitable donations that are legal and ethical under local laws and practices and which are in accordance with the ACE Charity Policy.

### Record keeping

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

### Responsibilities and raising concerns

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for ACE, in any capacity. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy

Workers are required to notify the company as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.



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Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee Workers if they breach this policy.

If any Third Party is aware of any activity by any Worker which might lead to, or suggest, a breach of this policy, they should raise their concerns with the HR Officer.

### Training and communication

Training on this policy is provided for all Workers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to clients, suppliers, contractors and business partners.

Signed: KJ Burraway

Dated: 22<sup>nd</sup> April 2020

Name: Kevin Burraway

Position: Director

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Company Registration No.: 03250106