## **Bribery & Corruption Policy**



## **Policy statement:**

Solo Service Group is committed to conducting its business with the highest ethical standards and in compliance with all applicable laws and regulations.

This Bribery and Corruption Policy outlines our zero-tolerance approach to bribery and corruption and provides guidelines for all employees, contractors, agents, and representatives of Solo Service Group referred to collectively as "Personnel", when conducting business in the United Kingdom.

Compliance with the UK Bribery Act 2010 Solo Service Group strictly adheres to the requirements of the UK Bribery Act 2010.

This policy serves as a framework for preventing, detecting, and reporting any bribery or corrupt activities within our organisation.

## **Prohibited conduct:**

**BRIBERY:** No employees shall directly or indirectly offer, promise, give, request, agree to receive, or accept any bribe, kickback, or other unlawful or improper benefit, whether monetary or non-monetary, to or from any individual or entity, in order to obtain or retain business, influence any business decision, or gain any improper advantage.

**FACILITATION PAYMENTS**: Strictly prohibits the making or acceptance of facilitation payments. Facilitation payments are small payments or bribes made to secure or expedite routine government actions or services to which an organization is entitled.

**GIFTS, HOSPITALITY, AND ENTERTAINMENT:** Gifts, hospitality, and entertainment must be reasonable, proportionate, and transparent. Employees must avoid offering or accepting gifts, hospitality, or entertainment that could create a conflict of interest, compromise impartiality, or be seen as an attempt to improperly influence business decisions.

**DUE DILIGENCE**: Solo Service Group is committed to conducting appropriate due diligence when engaging with business partners, such as suppliers, agents, contractors, and joint venture partners. Employees involved in the selection and management of business partners must perform reasonable and risk-based due diligence to ensure that partners adhere to similar anti-bribery and corruption standards.

**RECORD-KEEPING**: Accurate and transparent record-keeping is essential to prevent bribery and corruption. Employees must maintain complete and accurate records of all transactions, expenses, and payments related to business activities. Records must be retained for the duration required by applicable laws and regulations.

**REPORTING AND WHISTLEBLOWING**: Solo Service Group encourages all employees to report any concerns or suspicions of bribery, corruption, or other improper activities promptly and confidentially. Employees should report such matters through established reporting channels, such as the designated ethics hotline or reporting mechanism. Solo Service Group is committed to protecting whistle-blowers from retaliation.

**COMPLIANCE TRAINING AND AWARENESS**: Solo Service Group provides regular anti-bribery and corruption training to all employees to ensure awareness and understanding of their obligations under this policy and relevant laws. Training programs aim to prevent, identify, and address bribery and corruption risks and provide guidance on ethical decision-making.

**COMPLIANCE MONITORING AND REVIEW**: Solo Service Group conducts regular reviews and assessments to monitor compliance with this policy and related procedures. The effectiveness of controls, training programs, and reporting mechanisms will be evaluated, and necessary improvements will be implemented.

**CONSEQUENCES OF NON-COMPLIANCE**: Violations of this policy will be taken seriously and may result in disciplinary action, up to and including termination of employment or contractual relationship. Non-compliance with this policy may also lead to legal action and exposure to fines, penalties, and reputational damage for both individuals and Solo Service Group.

**POLICY COMMUNICATION AND ACCESSIBILITY**: This policy shall be communicated to all employees and made accessible through the organisation employee handbook, or other appropriate means. Any updates or revisions to this policy shall be promptly communicated to all relevant stakeholders.

**POLICY REVIEW**: This policy will be reviewed periodically to ensure its continued relevance and effectiveness. Any necessary updates will be made to reflect changes in legislation, industry practices, or the business environment.

Caroline Cooper
Managing Director
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