

Anti-Bribery and Corruption Policy

Policy Statement

Grestec Tiles Ltd is committed to conducting all business operations ethically, transparently, and with complete integrity. The company maintains a zero-tolerance approach to bribery and corruption and complies fully with the UK Bribery Act 2010.

Policy Scope

- Covered Individuals: This policy applies to all employees, directors, contractors, and consultants of Grestec Tiles Ltd.

- Third-Party Relations: This policy applies to agents and any third parties acting on behalf of Grestec Tiles Ltd.

Definition of Bribery

Bribery is defined as the offering, promising, giving, requesting, receiving, or soliciting of any financial or other advantage to induce or reward the improper performance of a relevant function, duty, or business activity.

Prohibited Conduct

Grestec Tiles Ltd strictly prohibits offering or accepting bribes, facilitation payments, or anything of value intended to secure an improper business advantage.

Gifts and Hospitality

Gifts and hospitality must be reasonable, proportionate, and transparent. All gifts and hospitality must be recorded in a register. The following thresholds apply:

- Up to £50: Acceptable without prior approval.
- £51 to £150: Requires prior written approval from a Line Manager.
- Above £150: Requires formal written approval from Senior Management.

Facilitation Payments

Facilitation payments are strictly prohibited across all operations.

Responsibilities

- Individual Duty: All individuals must act with integrity and report any concerns.
- Management Duty: Management must ensure ongoing compliance and uphold ethical standards.

Ministry of Justice Principles

Grestec Tiles Ltd adheres to the six Ministry of Justice principles: Proportionate Procedures, Top-Level Commitment, Risk Assessment, Due Diligence, Communication (including training), and ongoing Monitoring and Review.

Record Keeping

Accurate financial records must be maintained at all times. No false, misleading, or off-the-books entries are permitted.

Reporting Concerns

Concerns regarding suspected violations must be reported directly to management. Employees raising issues in good faith will not face retaliation.

Training

Relevant staff will receive training on anti-bribery requirements. Training ensures personnel understand their legal obligations and policy expectations.

Breaches of Policy

Breaches of this policy may result in internal disciplinary action, dismissal, termination of contracts and potential legal consequences.

Review

This policy will be reviewed regularly to ensure ongoing compliance. Revisions and updates will be made as required by legal or operational changes.