



**complete**treecare  
Contracting & Consultancy

# **Complete Tree Care Limited**

## **Anti Bribery and Corruption Policy 2025**

## **Anti Bribery and Corruption Policy Statement**

Complete Tree Care Limited has a zero-tolerance position on bribery and corruption. This policy document provides information and guidance for all employees of Complete Tree Care Ltd on how to deal with these issues should they arise.

Complete Tree Care Ltd is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. The company shall comply with the Bribery Act 2010, in regards to our conduct. The company understands that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

It is our policy to conduct all of our business in an honest and ethical manner. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

**SIGNED BY DIRECTOR**

A handwritten signature in black ink, appearing to be 'J. J. J.', is written on the page.

**DATE: 13<sup>th</sup> February 2025**

**REVIEW DATE: 12<sup>TH</sup> February 2024**

## **Anti bribery and corruption policy and procedures**

### **1.0 Definition of bribery**

Bribery refers to the act of offering or giving something of value or of an advantage so as to induce or influence an action or decision. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery nor must they accept bribes in any form and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from their Manager or Director or Team Leader.

Examples of bribes may include:

- Accepting payment or other inducement for additional works not charged for by the company,
- Accepting payment for use of company equipment, resources or the use of any other company resource,

### **2.0 What is and what is not acceptable**

#### Gifts and hospitality:

Complete Tree Care Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage,
- b. It is not made with the suggestion that a return favour is expected.
- c. It does not include cash or a cash equivalent, e.g. a voucher or gift certificate.

- d. It is given or received openly, not secretly.
- e. It is not above a certain excessive value, as pre-determined by the company's director, i.e. in excess of £50.

#### Facilitation Payments and Kickbacks:

Complete Tree care Ltd does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

#### Political Contributions:

Complete Tree Care will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

#### Charitable Contributions:

Complete Tree Care accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

### **3.0 Compliance with this policy:**

All Employees have the responsibility to read, understand and comply with this policy. A copy shall be placed on our web site (employee section). You should, at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms.

#### **4.0 Record keeping**

Complete Tree care Ltd will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.