

Anti-Bribery & Corruption Policy

Brothers Cleaning Group commit to carrying out all activities within the company in an honest and ethical manner. We will take a zero-tolerance approach to dealing with bribery and corruption and expect that all persons, both employed and those who are contracted to carry out work for Brothers Cleaning Group act in the correct manner. The persons that this policy applies to is all individuals working for or on behalf of Brothers Cleaning Group at all levels of the company. These persons include all staff whether permanent, fixed term or temporary, including contractors, volunteers, consultants and any other persons who provided services on behalf of Brothers Cleaning Group. For the purpose of this policy, all the above categories will be referred to collectively as Employee(s).

Brothers Cleaning Group will ensure that all business transactions and activities stay within the guidelines as set out in the "Bribery Act 2010". This applies to all activities both inside of the United Kingdom and abroad.

Bribery and Corruption

- Bribery is defined as – offering, promising, agreeing to receive or giving of a financial or other advantage to induce or reward improper functions or activities and/or the request or receipt of such an advantage.
- Corruption is a form of dishonesty or criminal activity undertaken by a person or organization entrusted with a position of authority, often to acquire illicit benefit. Corruption may include many activities including bribery and embezzlement, though it may also involve practices that are legal in many countries.
- The Bribery Act 2010 applies to any incorporated organisation or partnership.
- The pursuit of charitable or educational aims or of public functions is irrelevant.
- The organisation will be caught by the rules if it engages in commercial activities, irrespective of the purpose for which profits are made.
- A commercial organisation will have a statutory defence (a legal defence) if it can show that it had adequate procedures in place to prevent employees and other persons associated with it from acts of bribery. The standard of proof which the commercial organisation would need to discharge in order to prove the defence is 'on the balance of probabilities.'

Brothers Cleaning Group prohibit any employee from carrying out any of the following activities;

- Receiving payments, gifts or benefits in the expectation that the giver will receive an improper business advantage.

- Providing, or promising to provide a gift such as, payment, benefit in exchange, hope that Brothers Cleaning Group will gain a business advantage or as payment for receiving said advantage.
- Providing, or promising to provide a gift such as payment or benefit to a foreign public official in exchange or as payment for a business advantage.
- Undertake any activity that leads to a breach of this policy or the “Bribery Act 2010”.
- Undertake any activity that encourages or threatens a fellow employee to commit bribery or any activity that threatens employees who raise concerns about activities that breach the Anti-Bribery and Corruption policy.

Brothers Cleaning Group Responsibilities

- Brothers Cleaning Group will ensure that a suitable Anti-Bribery policy has been developed and is regularly reviewed to ensure that the information contained with it is correct and current.
- Brothers Cleaning Group will carry out an Anti-Bribery & Corruption Risk Assessment that is applicable to the size and activity of the company’s current position.
- Brothers Cleaning Group will develop Anti-Bribery & Corruption objectives and processes.
- Brothers Cleaning Group will ensure that the company meets its compliance obligations and looks for continual improvement.
- Brothers Cleaning Group will conform to organisational Anti-Bribery & Corruption requirements.
- Brothers Cleaning Group will regularly review the operations Anti-Bribery & Corruption management system annually or if there are significant changes within the activity and size.

Employee Responsibilities

- To report any bribery or corruption activities.
- To ensure they do not engage in acts of bribery and corruption.
- Engage in any training activities organised by the company.

Arrangements

Anti-Bribery Risk Assessment:

Brothers Cleaning Group will ensure that as a company, Brothers Cleaning Group carry out a Bribery/Corruption risk assessment to determine the risk of activities of the company to bribery and corruption, as set out in the Bribery Act 2010.

The risk assessment will assess the company against the following factors:

- Possible cause and sources of exposure to bribery/corruption.
- The severity of consequences from potential bribery/corruption.
- The likelihood that bribery/corruption can occur.
- The suitability of the organization's existing controls to mitigate these bribery/corruption risks.

In order to assess these risk Brothers Cleaning Group will consider the following factors:

- The country in which Brothers Cleaning Group wants to do business.
- The sector in which Brothers Cleaning Group operates.
- The value and duration of its projects.
- The kind of business activities Brothers Cleaning Group undertakes.
- The people that Brothers Cleaning Group engages to do its business.

Brothers Cleaning Group will review the organisations Anti-Bribery & Corruption management system annually or earlier if there are significant changes within the activity and size.

Information, Instruction and Training

In order to comply with the Bribery Act 2010, Brothers Cleaning Group will ensure that all employees have training relevant to their activities and risks.

Information, Instruction and training deter acts of bribery and corruption by reinforcing the message put down in the organisation's commitment and procedures. This also increases the effectiveness of the monitoring, evaluation and review of bribery and corruption prevention.

The training provided will be proportionate to the size and activity of the organisation. For most employees, simply communicating the policies and procedures of Brothers Cleaning Group by senior staff will be enough. This will be done by communication of this policy through employee engagement such as toolbox talks and signing on to this policy. For higher risk employees and senior management, it may be appropriate for these employees to attend specific Anti Bribery training. This will be determined by the activities and risk of these employees and our organisation.

Monitoring, Audit and Review

At Brothers Cleaning Group, we believe that regular monitoring, auditing and review is vital to ensuring that the Anti-Bribery and Corruption Management System stays effective and relevant. Brothers Cleaning Group will encourage a wide range of differing methods to ensure that the company management system is of the highest quality. As an organisation we will carry out the following forms of review:

- Formal Periodic Reviews and reports.
- Staff Surveys/Questionnaires.

- Monitoring of the ethical quality of transactions.
- Whistleblowing procedures.
- Internal Financial control mechanisms.
 - Accounting and record keeping practices.
- Monitoring and periodic review by senior management of the suitability, adequacy and effectiveness of the organisation's procedures.

Ensuring Sub-Contractors comply with our Anti-Bribery Policy

Brothers Cleaning Group will ensure that we carry out due diligence in accordance the Bribery Act 2010.

We will carry out due diligence on all persons who will perform services for it or on its behalf. A customer or someone who simply supplies it with goods is unlikely to do that, so it is very unlikely that there will be a need to consider carrying out due diligence on customers or on persons further down the supply chain.

For labour only sub-contractors, we will ensure that they sign onto this policy and undergo the relevant training with ourselves.

For sub-contracting companies, we will ensure that they have a robust Anti-Bribery and Corruption management system. We will check this by one of the following ways:

- Checking if they have external accreditation.
- Checking if they have external audit (Such as ISO 37001).
- Completed Sub-Contractor Company Pre-Qualification Questionnaires.
- Gathering and checking the Sub-contractor companies' Anti-Bribery and Corruption policies and procedures (Anti-Bribery and Corruption Policy, Risk assessment, Qualifications/Training, etc).

Charitable Donations

Brothers Cleaning Group will only make charitable donations that are both ethical and legal under local laws. All donations must be in accordance with Brothers Cleaning Group policies and procedures ensuring that they are not given in order to gain an unethical business advantage.