

# Anti Bribery and Corruption (ABC) Policy

**Document Owner:** Mark Evans

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## 1. Introduction

**Jnoad** is committed to conducting its business with integrity, transparency, and in full compliance with all applicable laws. This Anti-Bribery and Corruption (ABC) Policy outlines the Company's stance on bribery and corruption, as well as our expectations of employees, contractors, suppliers, and all other business partners. This policy is aligned with the **UK Bribery Act 2010** and good industry practices.

The aim of this policy is to ensure that **Jnoad** and its personnel avoid involvement in corrupt practices, both domestic and international, and prevent any potential breaches of UK anti-bribery legislation.

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## 2. Legislative and Regulatory Framework

This policy is primarily informed by the following legislation and guidance:

- **The Bribery Act 2010 (UK)**, which sets out the criminal offenses of offering, receiving, or facilitating bribes in both the public and private sectors.
- **The UK Proceeds of Crime Act 2002** and **The Money Laundering, Terrorist Financing, and Transfer of Funds Regulations 2017**.
- **The OECD Anti-Bribery Convention**, which promotes the fight against bribery in international transactions.
- **Industry standards and best practices as defined by organisations such as the Chartered Institute of Building (CIOB) and Construction Industry Council (CIC)**.

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### **3. Core Principles of the Bribery Act 2010**

**The Bribery Act 2010 establishes four key offenses:**

- 1. Offering, giving, or promising a bribe – directly or indirectly giving, offering, or promising a bribe to another person.**
- 2. Requesting, agreeing to receive, or accepting a bribe – directly or indirectly requesting, agreeing to receive, or accepting a bribe.**
- 3. Bribing a foreign public official – offering a bribe to a foreign public official to influence them in their official capacity.**
- 4. Failure of a commercial organisation to prevent bribery – an organisation can be held criminally liable if it fails to take adequate measures to prevent bribery by its employees, agents, or subcontractors.**

**Penalties for bribery offenses include substantial fines for businesses and imprisonment for individuals, with the risk of severe reputational damage.**

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### **4. Definition of Bribery and Corruption**

**Bribery refers to the act of soliciting anything of value with the intention of influencing the actions of the recipient, whether that is a public official, private individual, or corporate entity.**

**Corruption involves the abuse of entrusted power for personal or corporate gain, often involving bribery but can also include other unethical practices, such as fraud, misrepresentation, or conflicts of interest.**

**Examples of bribery and corruption may include:**

- Offering or receiving money, gifts, or benefits to influence business decisions.**
- Providing gifts or entertainment beyond what is considered reasonable**
- Providing kickbacks or commissions to secure contracts.**

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## **5. Our Commitment and Responsibilities**

**Jnoad is committed to the highest standards of ethical conduct in all its dealings, whether with clients, employees, contractors or suppliers. Jnoad strictly prohibits:**

- **Any form of bribery, whether directly or indirectly.**
- **The offering or receiving of bribes, gifts, or favours with the intent to influence business decisions or actions.**

### **Employees' and Third-Party Responsibilities:**

- **Employees and third parties acting on behalf of Jnoad must comply with this policy and report any suspected breaches.**
- **All employees and partners should be aware of the potential risks of bribery and corruption within the industry and remain vigilant at all times.**

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## **6. Examples of Bribery and Corruption**

### **Receiving Bribes:**

- **A luxury gift or financial kickback in exchange for awarding a subcontract to a particular supplier.**
- **A bribe from a contractor in exchange for guaranteeing them a contract.**

### **Giving Bribes:**

- **Offering a bribe to a public official to secure faster permits for a project.**
- **A supplier offers a bribe to a procurement manager to ensure their bid is chosen.**

### **Gifts and Hospitality:**

- **Permitted: Low-value items (e.g., pens, calendars) or modest meals (e.g., lunch) which are not intended to influence a business decision.**
- **Prohibited: Expensive gifts, lavish trips, or entertainment that could be perceived as influencing a business decision.**

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## **7. Guidelines for Gifts and Hospitality**

**Jnoad recognises that giving or receiving modest gifts and hospitality can be part of good business practice. Gifts or hospitality should not be offered or accepted if they could influence, or appear to influence, a business decision.**

- **Gifts:** Gifts should be of nominal value and should not be lavish, nor should they be offered during sensitive negotiations or decision-making processes.
- **Hospitality:** Modest meals, tickets to sporting events, or other similar entertainment may be acceptable if the intent is not to gain influence.

**Employees must disclose any gift or hospitality received or offered if the value exceeds £50, or if there is any suspicion that the gift may be offered to influence a decision.**

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## **8. Declaration of Gifts and Hospitality**

**To maintain transparency, all employees and contractors are required enter all gifts and hospitality offered or received in the HR register. This helps to ensure that no individual is exposed to accusations of bribery or corruption.**

**Log Requirements:**

- **Date of gift/hospitality**
- **Name of giver/receiver**
- **Description and estimated value of the gift/hospitality**
- **Purpose/Reason for the gift or hospitality**
- **Approval (if applicable)**

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## **9. Training and Awareness**

**Jnoad will provide regular training on anti-bribery and corruption practices to all employees, particularly those in positions of responsibility. This includes:**

- **Induction training for new hires.**
- **Ongoing education on the Bribery Act, this policy, and case studies.**
- **Clear reporting channels for employees to raise concerns or report any violations of this policy.**

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## **10. Reporting and Whistleblowing**

**Employees and business partners are encouraged to report any concerns about bribery or corruption. Jnoad has established a confidential and protected whistleblowing procedure to enable reporting of:**

- **Suspected bribery or corruption.**
- **Breaches of this policy.**
- **Any concerns related to compliance with UK anti-bribery and corruption laws.**

**Reports can be made directly to HR, a senior manager, or via the Company's anonymous ("whistleblower") company website contact.**

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## **11. Consequences of Breaches**

**Any employee found to have breached this policy may face disciplinary action, up to and including termination of employment. Additionally, criminal prosecution under the Bribery Act 2010 may result in severe penalties.**

**Jnoad will not tolerate any form of retaliation against employees who report in good faith.**

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## **12. Conclusion**

**Jnoad is committed to fostering a culture of integrity, accountability, and transparency. We expect all employees, contractors, and business partners to uphold the highest standards of ethical conduct and comply with this Anti-Bribery and Corruption Policy.**

**If you have any questions or concerns about this policy or its application, please contact your line manager or HR - [Lynn@jnoad.co.uk](mailto:Lynn@jnoad.co.uk).**

## **9. Approval**

**Approved by:**

Mark Evans   
Policy Owner

Date: 29th September 2025