Anti-Bribery policy statement

Keltbray recognise that bribery is a criminal offence (Bribery Act 2010), and it is Keltbray's policy that it does not and will not pay bribes or offer improper inducements to anyone, for any purpose. Nor does it accept bribes or improper inducements. Using a third party as a conduit to bribe others is a criminal offence. Keltbray does not, and will not, engage indirectly in or, otherwise, encourage bribery.

Keltbray is committed to the prevention, deterrence and detection of bribery and has a zero-tolerance towards bribery. It aims to maintain anti-bribery compliance 'business as usual', rather than as a one-off exercise.

Bribery is an inducement or reward offered, promised or provided to gain personal, commercial, regulatory or contractual advantage.

It is unacceptable to:

- Give or promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure.
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
- Retaliate against or threaten a person who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in activity in breach of this policy.

Policy objectives

This policy provides a coherent and consistent framework to enable Keltbray employees to understand and implement arrangements enabling compliance. In conjunction with related policies and key documents it will also enable employees to identify, and effectively report, a potential breach. We require staff, including permanently employed, temporary agency staff, contractors, volunteers and consultants to:

- Act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible.
- Comply with the spirit, as well as the letter, of the laws and regulations of all jurisdictions in which Keltbray operates, in respect of the lawful and responsible conduct of activities.

Keltbray commitment

- Setting out a clear anti-bribery policy and keeping it up to date.
- Making all employees aware of their responsibilities to strictly adhere to this policy at all times.
- Providing mandatory anti-bribery and corruption training for relevant employees and ensuring refresher training is completed as required.
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting police and other appropriate authorities in any resulting prosecution.
- Taking firm and vigorous action against any individual(s) involved in bribery.
- Provide information to all employees to report breaches and suspected breaches of this policy.
- Include appropriate clauses in contracts to prevent bribery.
- Avoid working with businesses who do not commit to Anti-Bribery practices.

Facilitation payments

Facilitation payments are not tolerated and are illegal. Facilitation payments are unofficial payments made to public officials in order to secure or expedite actions.

Gifts and hospitality

Sample tokens of modest value bearing the name or insignia of the organisation giving them (for example, pens, diaries or calendars) whether given personally, or received in the post, may be retained unless they could be regarded as an inducement or reward. You should refuse the offer or invitation (or return the gift) unless your Line Manager has advised that it may be accepted or retained.

Staff responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Keltbray or under its control. All staff are required to avoid activity that breaches this policy, and:

- Ensure that this policy is read, understand and complied with
- Raise concerns as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

As well as the possibility of civil and criminal prosecution, employees that breach this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

Raising a concern

Keltbray is committed to ensuring that all employees have a safe, reliable, and confidential way of reporting any suspicious activity. Keltbray wants each and every member of staff to know how they can raise concerns. All employees have a responsibility to help detect, prevent and report instances of bribery. If there is a concern regarding a suspected instance of bribery or corruption, there are various ways for the issue to be raised, being:

- Contact your Direct Line Manager/Supervisor
- Contact your Head of Department/Manager
- Contact the HR department at Head Office

Preferably the disclosure will be made and resolved internally (e.g. Line Manager / Head of Department / Director). In the event that an incident of bribery, corruption, or wrongdoing is reported anonymously, Keltbray will act as soon as possible to evaluate the situation. Keltbray has clearly defined procedures for investigating fraud, misconduct and non-compliance issues and these will be followed in any investigation of this kind; however, this is easier and quicker if concerns that are raised are not anonymous.

Keltbray and its management team fully support this policy and are committed to provide competent personnel and financial resources to implement it. This policy statement shall be reviewed annually by all interested parties. All Keltbray policies are available on the Keltbray Business Management System. New employees are briefed on the use of the Business Management System and locations of the Keltbray policies and any reviews or key changes in the policies are advised to employees.



Peter Burnside
Chief Executive Officer

Last review date: June 2026
Next review date: June 2027