Qualitech Environmental services Ltd is committed to implementing and enforcing effective system to counter bribery. Therefore, it is Qualitech policy to always conduct all aspects of its business in an honest and ethical manner

Under the UK law, bribery and corruption is a punishable offence for individuals up to 10 years imprisonment. If the company is found to have taken part in the corruption or lacks adequate procedures to prevent bribery it could face an unlimited fine and be excluded from tendering for government contracts.

The aim of this policy is to help Qualitech act in accordance with the Bribery Act and maintain the highest possible standards of business practice, advise individuals of the company zero tolerance to bribery.

This policy applies to all permanent and fixed term staff employed by Qualitech, and any contractors, consultants or other persons acting under or on behalf of the company.

* Qualitech will not make contributions of any kind with the purpose of gaining any commercial advantage.
* Qualitech will not provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
* Qualitech will not make or accept kickbacks of any kind.

**Company Responsibility**

Qualitech will:

* Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
* Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
* See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

**Employee Responsibility:**

Employees must not:

* Accept any financial or other reward from any person in return for providing some favour.
* Request a financial or other reward from any person in return for providing some favour.
* Offer any financial or other reward from any person in return for providing some favour.

**Non Compliance**

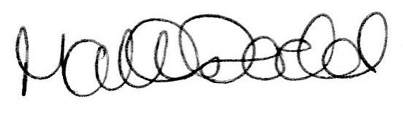
All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a lack of clarity over job role, learning needs or expected standards of performance, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company’s Disciplinary Policy up to and including dismissal.

**Signed as the person responsible**

**for Anti Bribery & Corruption**

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**Director**