**1. Purpose**

The purpose of this policy is to set out the responsibilities of NWF Facilities Ltd and those who work with us in observing and upholding our zero-tolerance position on bribery and corruption. This policy also reinforces our commitment to acting ethically, transparently, and in accordance with sustainability values—including climate change-related ethics in procurement, business conduct, and partnerships.

**2. Scope**

This policy applies to all employees, directors, officers, contractors, consultants, agency workers, suppliers, and any third parties associated with NWF Facilities Ltd, regardless of location or role. It applies to both the public and private sectors and covers all forms of bribery and corruption.

**3. Policy Statement**

NWF Facilities Ltd is committed to conducting business fairly, honestly, and openly. We do not tolerate any form of bribery or corruption, and we actively promote a culture of integrity and compliance. This includes ensuring that no employee or representative:

* Offers, gives, solicits, or receives a bribe
* Accepts or facilitates improper payments or advantages
* Engages in conduct that could be perceived as bribery or unethical behaviour
* Undermines sustainability principles or climate commitments in exchange for financial or other gain

**4. Definitions**

**Bribery** is the offering, giving, receiving, or soliciting of any item of value (cash, gifts, hospitality, services, or favours) to influence a decision or gain improper advantage. This includes:

* Bribes to or from public officials
* Kickbacks or commissions to secure contracts
* Gifts or hospitality intended to influence behaviour
* Bribes related to environmental contracts or compliance schemes

**5. Legal Framework**

This policy complies with the **Bribery Act 2010**, which outlines four key offences:

1. Bribing another person
2. Being bribed
3. Bribery of a foreign public official
4. Failure of a commercial organisation to prevent bribery

NWF Facilities Ltd may also be held liable for failing to prevent bribery by an associated person.

**6. Responsibilities**

* **Directors and Senior Management:** Set the ethical tone, ensure controls are in place, and lead by example
* **Managers and Supervisors:** Monitor conduct, ensure compliance, and report concerns
* **Employees and Contractors:** Understand the policy, complete required training, and report any suspected bribery
* **Relevant Manager or Compliance Officer:** Maintain the anti-bribery framework, conduct investigations, and update the risk register

**7. Gifts and Hospitality**

Gifts and hospitality are only permitted where they are:

* Reasonable and proportionate
* Not given with the intent of securing an unfair advantage
* Declared and recorded in the **Gifts and Hospitality Register**
* In line with the company’s environmental and ethical values (e.g. avoiding unsustainable or high-carbon items)

Lavish, frequent, or undisclosed gifts or hospitality are not permitted and will be treated as a potential breach.

**8. Procurement and Climate Considerations**

* Procurement must be transparent and based on merit and environmental responsibility
* Bribes to influence environmental certifications, project outcomes, or regulatory approvals are strictly prohibited
* Suppliers must comply with our anti-bribery, environmental, and climate commitments and will be subject to review or removal if they fail to meet these standards

**9. Reporting Concerns**

Suspected bribery or corruption must be reported immediately to the **relevant manager** or via the company’s whistleblowing process. Reports will be treated confidentially, and no employee will face retaliation for raising genuine concerns.

**10. Consequences of Non-Compliance**

Breaches of this policy are treated as gross misconduct and may lead to:

* Disciplinary action up to and including dismissal
* Termination of contracts with suppliers or partners
* Criminal prosecution under the Bribery Act 2010

**11. Training and Communication**

* All staff must complete anti-bribery and corruption training as part of induction
* Annual refresher training is provided
* Managers will receive additional training on procurement integrity and climate-ethical decision-making

**12. Monitoring and Review**

This policy will be reviewed annually or following:

* Legislative or regulatory changes
* Emerging risks in business practices or supply chains
* Company audits or incidents involving bribery or corruption

**Signed:**  
[Director’s Name]  
Managing Director  
NWF Facilities Ltd  
**Date:** 01.02.2025