



CCS Group Limited and its subsidiaries, Cleshar, ITS and GPX, maintain the highest professional standards across all areas of its business and operations and does not tolerate bribery or corruption of any kind.

The Group is also committed to ensuring that employees of the Group adhere to the highest standards of ethical conduct and integrity in their business activities.

This policy sets out the rules that must be followed by the Group to prevent and prohibit bribery and corruption in accordance with the Bribery Act 2010 and other relevant legislation.

## Unacceptable behaviour

The Group operates a zero tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited whether committed by employees or anyone else acting on the Group's behalf.

Employees must not offer, promise or give bribes, financial or otherwise nor request or accept bribes of any form. This can be money, gifts, meals, entertainment or anything else of value which may inducement a person or in any way impact someone acts and/or behave in a dishonest or illegal way.

Business gifts, hospitality and expenses are addressed in the Group's Gifts and Hospitality Policy.

Donations made to charities, political parties or other organisations must first be sanctioned by the Group Finance Director. Any items of expenditure that give rise to concern are fully investigated.

## Raising concerns

Any employee who is concerned that he or she is potentially being bribed should report this to his or her head of department immediately. Employees also have wider responsibilities to report any suspected malpractice by others. Any deliberate act of or failure to report suspicions of corruption or to conceal bribes, or the offer of bribes by others, will also be subject to disciplinary action.

All reporting will be managed sensitively, and the Group will take all necessary steps to ensure that any employee who reports a concern can do so without fear of reprisal or detrimental effect. Should an employee feel uncomfortable about raising concerns directly to the head of department, he or she should inform another senior manager or the Head of HR.

## Disciplinary action

The Group will take disciplinary action against any employee found to have offered or accepted a bribe; which could result in dismissal. Should any employee have questions regarding his/her obligations set out in this policy or require advice on situations that lie outside its terms, he/she should contact the Head of HR.

**Michael Hesnan**  
Joint Managing Director

**Andy Redican**  
Joint Managing Director

