



## ANTI-BRIBERY AND CORRUPTION POLICY

CIVCONS DESIGN is implementing this policy in order to ensure the standards of integrity in its business. The company has reviewed the aspects of bribery and corruption and expects that all employees, partners, customers or other associates to comply with this policy and to ensure that no offence under the *Bribery Act 2010* is committed for which the company or other party could be liable. Any act of misconduct can result in the dismissal of any employee or cancellation of any agreement with other parties.

*The Bribery Act 2010* makes it a criminal offence for an individual to offer or accept a bribe and it is punishable by a fine or by up to 10 years imprisonment. The Act also states that an offence will be committed by a company if they fail to prevent a person associated with the organisation from offering and accepting bribe which could cause the company to gain an advantage in the conduct of its business.

Bribery is one of the unacceptable acts in our Code of Conduit, and CIVCONS DESIGN understand the importance of following the law. The conviction of the company could cause severe damage to the reputation of the organization and any such action its against the principles found in our Code of Conduit.

Examples of bribery include giving or receiving a financial inducement or other advantage in order to:

- Secure or keep a contract;
- assure an order;
- gain any advantage over a competitor;
- turn a blind eye to a health and safety issue or poor performance
- falsify an inspection report or obtain a certificate.

The following conduct is prohibited by our by-laws and policies:

- masking unofficial payments to officials in order to obtain any permission, permit or stamp;
- accepting payments or giving incentives in return for accepting a tender for business.
- Making payments in order to obtain or retain business.

When any of our members acting on behalf of CIVCONS DESIGN, is considering entering into an agreement with a new supplier, customer or agent then they should consider whether or not that person or organisation is likely to be involved in corrupt or unlawful practices that may be contravention of the *Bribery Act 2010*.

Our representative should consider the nature of the business carried out by the other party, the location where the supplier, agent or customer is based and in what manner the negotiation is made.




If any issues are found relating to our associated then, our business activities with them will be ceased until the matter is solved and everything complies with the legal guidance implemented in the UK.

This policy will be updated in accordance with the laws and regulations of the UK. If any part of this policy is considered to sympathise the acts of bribery or corruption, then the policy will be stated as 'inactive' until the part has been removed or updated.

Also, this policy is in tight connection with our 'Code of Conduit', 'Partnership Agreement', 'Shareholders Agreement' and any other document signed by or on behalf of the CIVCONS DESIGN as well as our by-laws and policies that include any guideline on our employees, partners, customers and associates conduit principles.

This policy has been presented to the Executive Board and the Director and received unanimous vote to enter and be stated as an 'active' policy of CIVCONS DESIGN.

Tudor Moisa 

Managing Director  
Civcons Design Ltd.

4<sup>th</sup> of September 2020