



Anti-Bribery & Corruption Policy

Zero tolerance for bribery, improper inducements and corrupt procurement practices.

Document reference	BC-POL-007
Version	2.0
Status	Approved for publication
Approval date	08 August 2026
Next review	08 August 2027

Legal entity: Becks & Clates Ltd | Company number: 15821561
Registered office: 320 Firecrest Court, Centre Park, Warrington, WA1 1RG
Approved by: Director, Becks & Clates Ltd

Document control

Document title	Anti-Bribery & Corruption Policy
Reference	BC-POL-007
Owner	Director
Approved by	Director, Becks & Clates Ltd
Version	2.0
Effective date	08 August 2026
Review cycle	At least annually and following material legal, operational or organisational change

Document status: public. Printed copies are uncontrolled. The version published by Becks & Clates is the current controlled version.

Contents

1. Policy statement
2. Prohibited conduct
3. Gifts and hospitality
4. Conflicts of interest
5. Public sector and procurement
6. Third parties, records and due diligence
7. Reporting and consequences
8. Legal reference

Policy statement

Becks & Clates prohibits bribery and corruption in all forms and conducts business on the basis of legitimate value, transparent commercial decisions and lawful relationships.

This applies to directors, employees, workers, freelancers, agents, consultants and others acting on behalf of Becks & Clates.

Prohibited conduct

- Offering, promising, giving, requesting or accepting anything of value intended to improperly influence a decision.
- Facilitation payments or unofficial payments to speed up routine actions.
- Kickbacks, secret commissions or sham referral arrangements.
- Payments, gifts or hospitality designed to influence a tender, supplier selection, contract award, invoice approval or public official.
- Using a third party to do something Becks & Clates could not lawfully do itself.

Gifts and hospitality

Reasonable, proportionate and transparent hospitality may be legitimate when it supports normal business relationships and is not intended to influence an improper outcome.

- Cash and cash-equivalent gifts are prohibited.
- Gifts or hospitality during a live procurement, evaluation or sensitive decision must be avoided unless expressly permitted and clearly appropriate.
- Anything unusually valuable, frequent or sensitive must be referred to the Director before acceptance or offer.
- Client policies and public-sector restrictions must be followed where stricter.

Conflicts of interest

- Actual, potential or perceived conflicts relevant to a commercial decision must be disclosed.
- Personnel must not influence supplier selection where they have an undisclosed financial or close personal interest.
- Referral commissions or introductions must be documented and commercially legitimate.
- Conflicts are managed through disclosure, recusal, independent review or other proportionate controls.

Public sector and procurement

Extra care is required in public procurement and dealings with public officials. Becks & Clates will not offer benefits intended to secure preferential treatment, confidential tender information or improper access.

Success fees, commissions and marketing arrangements must never be used to disguise bribery or an unlawful inducement.

Third parties, records and due diligence

- Third-party payments must have a legitimate business purpose and appropriate supporting documentation.
- Invoices, expenses and accounting records must accurately describe the underlying transaction.
- Higher-risk intermediaries or unfamiliar overseas arrangements may require additional due diligence before engagement.
- Suppliers may be required to follow equivalent anti-bribery standards.

Reporting and consequences

- Suspected bribery, coercion, fraud or improper requests should be reported promptly to the Director.
- A person raising a genuine concern in good faith will not be penalised for doing so.
- Confirmed breaches may result in disciplinary action, contract termination, recovery of losses and referral to law enforcement where appropriate.

Legal reference

- Bribery Act 2010.
- Applicable fraud, procurement, company and accounting requirements.