

ANTI-BRIBERY, CORRUPTION AND FRAUD PREVENTION POLICY

Constructionline Common Assessment Standard • Core Policy • REF 7352

Document field	Controlled information
Company	Jimgos Maintenance Ltd
Policy owner	Joseph Olugosi, Managing Director
Approved by	Joseph Olugosi, Managing Director — signed J.O
Version / status	2.0 — Approved controlled issue
Issue and approval date	1 August 2026
Next formal review	1 August 2027, or sooner following a material change or incident

DIRECTOR'S COMMITMENT Jimgos Maintenance Ltd has zero tolerance for bribery, corruption and fraud. No contract, payment, programme pressure or commercial benefit justifies dishonest or improper conduct.

1. Purpose and policy statement

This policy establishes the Company's proportionate procedures for preventing, detecting, reporting and responding to bribery, corruption and fraud. It supports lawful and ethical decisions in tendering, procurement, subcontracting, site delivery, certification, invoicing and all other business activities.

The Company will comply with the Bribery Act 2010 and will maintain controls designed to prevent persons associated with the Company from bribing another person on its behalf. Deliberate concealment, false records and retaliation against a person who raises a genuine concern are prohibited.

2. Scope

This policy applies to the Managing Director, employees, workers, apprentices, agency personnel, consultants, subcontractors, suppliers, intermediaries and any other person or organisation performing services for or on behalf of Jimgos Maintenance Ltd ("associated persons"). It applies in the United Kingdom and to any activity overseas, including at offices, construction sites, occupied homes, client premises, vehicles, social events and online.

Contractors and suppliers must meet equivalent standards as a condition of appointment. Where local rules are less strict, this policy still applies unless doing so would breach local law; any conflict must be referred to the Managing Director before action is taken.

3. Legal framework

The Bribery Act 2010 creates four principal offences relevant to this policy:

1. Section 1 — offering, promising or giving a financial or other advantage intending to induce or reward improper performance.
2. Section 2 — requesting, agreeing to receive or accepting a financial or other advantage connected with improper performance.
3. Section 6 — bribing a foreign public official to obtain or retain business or a business advantage.
4. Section 7 — a commercial organisation failing to prevent bribery by a person associated with it, subject to the defence that adequate prevention procedures were in place.

This policy also addresses fraud and related dishonest conduct, including false representation, failure to disclose information where there is a legal duty to disclose, abuse of position, false accounting, conspiracy, theft and money laundering concerns. The Company will obtain legal advice where an allegation may engage criminal or regulatory law.

4. Definitions

Term	Meaning for this policy
Bribe	A financial or other advantage offered, promised, given, requested or accepted to induce or reward improper performance.
Corruption	Abuse of entrusted power, position or influence for private or improper gain.
Fraud	Dishonest conduct intended to make a gain, cause a loss or expose another to risk of loss.
Kickback	A return of part of a payment or benefit as a reward for arranging or retaining business.
Facilitation payment	An unofficial payment made to secure or speed up a routine action; it is prohibited.
Public official	A domestic or foreign government, public body or international organisation office-holder, employee or representative.
Associated person	Anyone performing services for or on behalf of the Company, assessed by the actual relationship and circumstances.

5. Prohibited conduct

- Offering, giving, requesting or accepting a bribe, secret commission, kickback or other improper advantage.
- Using cash, vouchers, gifts, hospitality, travel, discounts, jobs, donations, sponsorship or favours to influence a decision improperly.
- Making a prohibited payment indirectly through a subcontractor, agent, relative, consultant or other intermediary.
- Paying a facilitation payment, except where an immediate threat to health or safety leaves no safe alternative; any such event must be reported and recorded immediately.
- Bid-rigging, collusive quotations, cover pricing, sharing confidential tender information or agreeing not to compete.
- Creating or approving false invoices, certificates, variation claims, timesheets, expenses, test results, inspection records or completion evidence.
- Concealing a conflict of interest, splitting transactions to avoid approval limits, or diverting Company/client property or money.
- Retaliating against anyone who raises a concern honestly and in the public interest.

6. Gifts, hospitality and business courtesies

Reasonable and proportionate hospitality with a genuine business purpose is not automatically prohibited. It must be transparent, infrequent, lawful, accurately recorded and incapable of being reasonably perceived as an attempt to influence an award, inspection, certification, payment or other decision.

Rule	Required control
Cash / cash equivalent	Never offer or accept cash, gift cards, loans or personal rebates.
£50 or more	Obtain prior written Managing Director approval and enter the offer in the Gifts and Hospitality Register, whether accepted or declined.
Below £50	Record it where connected with a tender, public official, inspector, payment decision or repeated source; ask if uncertain.
Live tender / approval	Do not offer or accept any courtesy capable of influencing the process. Refer all proposals to the Managing Director.
Cumulative value	Benefits exceeding £100 from the same source in 12 months require enhanced review and written decision.

7. Donations, sponsorship and political activity

The Company does not make political donations. Charitable donations and sponsorship must be genuine, lawful, documented, paid to a verified organisation and approved in writing by the Managing Director. They must never be used as a route to reward a client contact, public official or connected person, or to secure business.

8. Conflicts of interest

All actual, potential or perceived conflicts must be declared promptly. Examples include personal or family relationships with clients, tenderers or suppliers; a financial interest in a subcontractor; accepting outside work from a business contact; or participating in a decision involving a connected person. The Managing Director will record the conflict and decide whether the person must withdraw, whether independent quotations or checks are required, or whether the relationship must end.

9. Risk assessment and adequate procedures

The Company applies the Ministry of Justice's six principles in a manner proportionate to its size, activities and risk profile:

Principle	Jimgos control
Proportionate procedures	Clear approval limits, registers, payment checks, contractual terms and escalation routes matched to risk.
Top-level commitment	Annual Director approval, visible zero-tolerance statement, resourcing and challenge of unusual transactions.
Risk assessment	Documented annual review and event-driven assessment of markets, clients, tenders, transactions, partners and staff exposure.
Due diligence	Risk-based checks on associated persons before appointment and enhanced checks where red flags arise.
Communication and training	Policy issue, induction, refresher briefing, targeted training and signed acknowledgement records.
Monitoring and review	Quarterly sampling, register review, incident lessons and formal annual review.

The risk assessment considers public-sector work, tender competition, use of intermediaries, high-value or urgent payments, cash requests, overseas links, commissions, personal relationships, gifts, changes in supplier bank details and unusual contract variations. It is reviewed annually and before entering a new high-risk relationship or market.

10. Third-party and subcontractor due diligence

Before appointing an associated person, the responsible manager will perform and retain checks proportionate to the relationship and risk. No one may be appointed to conceal a payment or avoid this policy.

- Verify legal identity, ownership, trading address, insurance, competence, references and relevant accreditation.
- Check reputation, conflicts, sanctions or adverse information where proportionate and lawful.
- Understand the service, commercial need, fee basis, payment destination and any use of sub-agents.
- Require invoices to describe genuine work and require payment to an account in the contracting party's name unless independently justified and approved.
- Include anti-bribery, audit, records, reporting and termination provisions in written terms.
- Repeat or enhance checks when ownership, bank details, scope, country, commission or risk changes.

11. Fraud prevention and financial controls

The following controls apply according to transaction value and business size. The person requesting or confirming work should not, wherever practicable, be the sole person approving the supplier, invoice and payment. Where staffing makes full separation impracticable, the Managing Director must complete and document an independent compensating review.

Risk area	Minimum fraud control and retained evidence
Supplier creation	Identity and bank-account verification; conflict declaration; approval before first payment.
Bank-detail changes	Verify through a trusted telephone number or known contact independent of the change request; record who checked and when.
Purchasing / invoices	Match quotation or order, delivery/work evidence and invoice; investigate duplicates, round sums, altered details and unexplained urgency.
Payments	Authorised payee and amount; no blank approvals; restrict online-banking access; review payment audit trail and unusual beneficiaries.
Expenses / cards	Original evidence, business purpose and independent approval; no personal expenditure or self-approval.
Payroll / time	Starter and leaver checks; approved hours; periodic check for duplicate bank accounts or fictitious workers.
Variations / certification	Written client authority where required; contemporaneous site evidence; accurate quantities, test results and completion records.
Assets / materials	Controlled issue of tools and materials, stock checks and investigation of unexplained loss.
Tendering	Confidential bid control, conflict declarations, genuine quotations and prohibition of collusion or cover pricing.
Cyber-enabled fraud	Multi-factor authentication where available, restricted access, phishing awareness and independent confirmation of unusual payment instructions.

12. Accurate records and retention

Books, invoices, quotations, timesheets, expenses, certificates, registers and approvals must be complete, accurate, timely and sufficiently detailed to show the true purpose of each transaction. Off-book accounts, undisclosed funds, misleading descriptions and destruction or alteration of relevant records are prohibited. Anti-bribery, due-diligence, approval, investigation and training records will normally be retained for at least six years, subject to legal, contractual and data-protection requirements.

13. Warning signs requiring escalation

- Requests for cash, payment to a third party, offshore account, inflated commission, false description or backdated paperwork.
- A proposed agent or subcontractor has no clear role, lacks relevant capability, refuses ownership checks or insists on secrecy.
- Unexplained success fee, personal gift, free private work, repeated hospitality or donation linked to a decision-maker.
- Duplicate invoices, round-sum variations, altered bank details, missing delivery evidence, inconsistent timesheets or test results.
- Pressure to bypass procurement, safety, quality or payment controls because a deadline is urgent.
- Rumours of collusion, family links or undisclosed interests involving a bidder, client representative or inspector.

14. Responsibilities

Role	Accountability
Managing Director	Owns the programme; approves the policy and higher-risk decisions; ensures resources, independent review and external reporting where necessary.
Managers / supervisors	Apply controls; brief teams; review documentation; challenge red flags; prevent conflicted approval; stop and escalate suspect activity.
All workers	Read and follow the policy; keep accurate records; complete training; refuse improper requests; disclose conflicts and report concerns promptly.

Role	Accountability
Associated persons	Comply with equivalent standards, cooperate with due diligence and audit, train relevant personnel and notify concerns or breaches.

15. Reporting concerns and protection

A concern, attempted bribe, suspected fraud, conflict or control weakness must be reported as soon as possible to Joseph Olugosi, Managing Director, or through the Company's Whistleblowing Procedure. If the allegation concerns the Managing Director, the reporter should use an appropriate independent route, such as the relevant client contact, professional adviser, regulator or law-enforcement authority.

Reports may be made confidentially. Anonymous reports will be considered where enough information is provided. No worker will suffer dismissal, detrimental treatment or retaliation for refusing bribery or for raising a genuine concern in good faith, even if it is not substantiated. Knowingly malicious allegations may be dealt with under the disciplinary procedure.

If a demand is accompanied by an immediate threat to personal safety, the individual should prioritise safety, make no promise beyond what is necessary, and report the event as soon as safe. Any payment made under duress must be recorded accurately and investigated.

16. Investigation and response

The Managing Director will log the concern, assess immediate risks, preserve documents and electronic evidence, protect confidentiality, identify conflicts and appoint an impartial investigator. Access or payments may be suspended where justified. The subject of an allegation will be treated fairly and no conclusion will be reached before proportionate enquiries are completed.

Outcomes and corrective actions will be documented. These may include recovery of funds, control improvement, retraining, disciplinary action, dismissal, contract termination and notification to a client, insurer, police, Serious Fraud Office or other competent authority. Nothing in this policy prevents any person from reporting suspected crime directly to an authority.

17. Breach and disciplinary consequences

A breach may constitute gross misconduct and may result in disciplinary action up to and including dismissal. Breach by a subcontractor, consultant or supplier may result in suspension, withheld approval of disputed sums, termination and exclusion from future work, subject to contract and law. Individuals and organisations may also face criminal prosecution, fines, imprisonment, confiscation, debarment and reputational damage.

18. Communication, training and acknowledgement

The policy will be issued at induction, made accessible to the workforce, explained in a briefing and communicated to relevant subcontractors and suppliers. Personnel in tendering, procurement, approvals, payments and client-facing roles receive role-relevant instruction. Refresher training is provided at least annually and sooner where the risk assessment, an incident, audit findings or legal change indicates a need. Attendance and signed acknowledgements are retained separately as communication evidence.

19. Monitoring, assurance and review

- Quarterly review of the Gifts and Hospitality Register, conflicts, donations, higher-risk supplier payments and reported concerns.
- Sample checks of invoices, variations, bank-detail changes, subcontractor files, expenses and tender records.
- Annual documented bribery and fraud risk assessment and review of whether controls operate in practice.
- Immediate review after a suspected breach, control failure, material business change or relevant legal/guidance update.
- Formal policy approval at least every 12 months; the next scheduled review is 1 August 2027.

Monitoring does not replace management responsibility. Any weakness identified must have an owner, target date and evidence of closure.

20. Required controlled records

Record	Minimum content
Gifts and Hospitality Register	Date; parties; description; estimated value; tender/public-official connection; decision; approver.
Conflict of Interest Register	Declarant; interest; affected decision; safeguards; reviewer; closure date.
Due Diligence Record	Identity, ownership, service, risk rating, checks, red flags, approvals, contract clauses and review date.
Bribery/Fraud Concern Log	Reference, date, issue, immediate action, investigator, outcome, referral and corrective actions; restricted access.
Training / acknowledgement	Policy version, participant, topic, delivery date, trainer, signature and refresher date.

21. Practical decision test

Before offering, accepting, approving or paying anything, ask: Is it lawful? Is there a genuine and proportionate business purpose? Is it permitted by this policy and the client's rules? Has any conflict been declared? Is approval independent? Would the full facts withstand client, auditor, regulator and public scrutiny? Is the transaction recorded accurately? If any answer is "no" or uncertain, stop and seek written guidance from the Managing Director.

22. Reference framework

- Bribery Act 2010, including sections 1, 2, 6 and 7 — legislation.gov.uk/ukpga/2010/23/contents
- Ministry of Justice, Guidance about procedures which relevant commercial organisations can put into place to prevent persons associated with them from bribing (six principles).
- Serious Fraud Office guidance on evaluating a corporate compliance programme.
- Fraud Act 2006 and applicable offences relating to false representation, failure to disclose and abuse of position.

23. Director approval

I approve this controlled policy for issue and confirm the Company's commitment to implement, communicate, monitor and review the controls described above.

Name	Position	Signature	Approval date	Next review
Joseph Olugosi	Managing Director	J.O	1 August 2026	1 August 2027