By Appointment to
His Majesty King Charles III
Building Conservation Services
SSH Conservation Ltd
Somerset

SSH CONSERVATION
HISTORIC BUILDING & MONUMENT CONSERVATION

Anti-Bribery and Corruption Policy

Bribery Act 2010

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Introduction

This anti-bribery policy exists to set out the responsibilities of SSH Conservation Ltd ("the Company") and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for the Company. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy Statement

The Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. The Company has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever we operate.

The Company will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regard to our conduct both at home and abroad.

Under section 7 of the Bribery Act 2010, the Company commits an offence if a person associated with it bribes another person intending to obtain or retain business, or an advantage in the conduct of business, for the Company (the corporate offence of failing to prevent bribery). It is a defence for the Company to show that it had adequate procedures in place designed to prevent persons associated with it from undertaking such conduct. This policy forms part of those adequate procedures.

The Company recognises that bribery and corruption are punishable by up to ten years' imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation.

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It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

Who Is Covered by the Policy?

1. This anti-bribery policy applies to the Managing Director, any employees, and everyone working under the Company's direction, including labour-only subcontractors, together with consultants, specialist subcontractors, agents and any other person or persons associated with us (including third parties), no matter where they are located (within or outside the UK).
2. In the context of this policy, third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisers, representatives and officials, politicians and public parties.
3. Any arrangements our company makes with a third party are subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of Bribery

1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage so as to induce or influence an action or decision.
2. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal advantage.
3. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
4. Bribery is illegal. Workers must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and, if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Managing Director.

What Is and What Is NOT Acceptable

This section of the policy refers to four areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and Hospitality

The Company accepts normal and appropriate gestures of hospitality and goodwill (whether given to or received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.

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- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the Company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It does not exceed £100 in value, unless it has been declared to and approved by the Managing Director.
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Managing Director.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Managing Director, who will assess the circumstances.

The Company recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Managing Director. Gifts from suppliers should always be disclosed. Gifts and hospitality above £100, given or received, are recorded in the Company's gifts and hospitality register kept by the Managing Director.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Managing Director should be sought.

Facilitation Payments and Kickbacks

The Company does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low-level officials with the intention of securing or speeding up the performance of a certain duty or action.

The Company does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

The Company recognises that, despite our strict policy on facilitation payments and kickbacks, workers may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

1. Keep any amount to the minimum.
2. Ask for a receipt, detailing the amount and reason for the payment.
3. Create a record concerning the payment.
4. Report this incident to the Managing Director.

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Political Contributions

The Company will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

The Company accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Workers must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Managing Director.

Worker Responsibilities

As someone working for the Company, you must ensure that you read, understand and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

Everyone working for the Company, and those under our control, is equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. Workers are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Managing Director.

If anyone working for the Company breaches this policy, appropriate action will be taken: an employee will face disciplinary action and could face dismissal for gross misconduct, and the Company has the right to terminate the engagement or contract of a labour-only subcontractor, specialist subcontractor or other associated person who breaches this anti-bribery policy.

What Happens If I Need to Raise a Concern?

This section of the policy covers three areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

How to Raise a Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the Company, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Managing Director.

The Company will familiarise everyone working for it with its Whistleblowing Policy so that concerns can be voiced swiftly and confidentially.

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What to Do If You Are a Victim of Bribery or Corruption

You must tell the Managing Director as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, the Company understands that you may feel worried about potential repercussions. The Company will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

The Company will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Managing Director immediately.

Training and Communication

The Company will provide training on this policy as part of the induction process for everyone working for the Company. Workers will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

The Company's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners and any third parties at the outset of business relations, and as appropriate thereafter.

The Company will provide relevant anti-bribery and corruption training to workers where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their workers with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

Record Keeping

The Company will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to review by the Managing Director. Gifts and hospitality above £100, given or received, are recorded in the Company's gifts and hospitality register kept by the Managing Director.

Monitoring and Reviewing

The Managing Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy and effectiveness.

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Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Workers are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Managing Director.

This policy does not form part of any contract of employment or engagement, and the Company may amend it at any time so as to improve its effectiveness at combating bribery and corruption. Where the Company employs staff, terms of employment are set out in their individual contracts.

Approval

This document is approved by the Managing Director and is reviewed at least annually, or sooner following a significant change in legislation, the business or its activities.

Signed	Signed copy held on file
Name	Jake Motley
Position	Managing Director, SSH Conservation Ltd
Date	22 October 2026

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