



Property | Maintenance | Fire Safety | Electrical

ANTI-BRIBERY AND CORRUPTION POLICY

In accordance with the Bribery Act 2010

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Document control

Field	Detail	Field	Detail
Document title	Anti-Bribery and Corruption Policy	Version	1.0
Issued by	Raheel Deen, Managing Director	Issue date	10.6.26
Policy owner	Raheel Deen, Managing Director	Review date	10.6.27

Policy statement

GND Group conducts its business honestly and without the use of corrupt practices or acts of bribery. We are committed to compliance with the Bribery Act 2010 and take a zero-tolerance approach to bribery and corruption in all our dealings.

Bribery is a criminal offence. It exposes the company and individuals to prosecution, fines and reputational damage, and it is strictly prohibited.

What is prohibited

No employee, subcontractor or person acting for GND Group may, directly or through a third party:

- offer, promise, give, request or accept a bribe;
- make or accept a payment to induce or reward the improper performance of any function;
- make a facilitation payment to speed up a routine action;
- offer or accept gifts or hospitality intended to improperly influence a business decision.

Gifts and hospitality

Reasonable and proportionate gifts and hospitality given openly are acceptable, provided they are not intended to influence a decision improperly and are not lavish or frequent. Anything beyond modest value should be declared to the Managing Director and recorded.

Third parties and subcontractors

Third parties acting for GND Group, including subcontractors and agents, are expected to comply with this policy. We will not work with parties we believe to be engaged in bribery or corruption.

Record keeping

Accurate records of payments, gifts and hospitality are kept. False or misleading records are prohibited.

Responsibilities

Overall responsibility for this policy rests with the Managing Director, Raheel Deen. Day-to-day responsibility is delegated to Harry Fodden, Head of Operations. Every employee and

subcontractor must avoid any activity that breaches this policy and must report any suspected bribery.

Reporting and consequences

Anyone who is offered a bribe, is asked to make one, or suspects bribery or corruption must report it to the Managing Director or under the whistleblowing policy. Reports are treated confidentially and no one will suffer detriment for raising a genuine concern.

Breach of this policy by an employee is a disciplinary matter and may lead to dismissal. Engagement with subcontractors who breach it will be terminated.

This policy is communicated to all employees and is available to clients, subcontractors and other interested parties on request. It is reviewed at least annually and following any relevant change in law or circumstances.

Signed: Raheel Deen	Date: 10.6.26
Raheel Deen	Managing Director, GND Group