

Anti-Bribery Policy



Castle Group Scotland Ltd (CGSL) is committed to enforcing effective systems to counter bribery. It is CGSL's policy to conduct all aspects of its business in an honest and ethical manner.

Under UK Law, The Bribery Act 2010, bribery, and corruption are punishable for individuals by up to ten years imprisonment. If CGSL is found to have taken part in the corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

CGSL act in accordance with The Bribery Act 2010, maintaining the highest possible standards of business practice, and advising individuals of their "zero-tolerance" to bribery.

This policy applies to all permanent and fixed-term staff employed by CGSL, and any contractor, consultant or other persons acting under or on behalf of CGSL.

CGSL will not:

- make contributions of any kind with the purpose of gaining any commercial advantage,
- provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties,
- make or accept "kickbacks" of any kind.

Company Responsibility

Castle Group Scotland Ltd will:

- keep appropriate internal records that will evidence the business reason for making any payments to third parties,
- encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage,
- see that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Employee Responsibility

Employees must not:

- accept any financial or other reward from any person in return for providing some favour,
- request a financial or other reward from any person in return for providing some favour,
- offer any financial or other reward from any person in return for providing some favour.

Non-Compliance

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety regarding addressing any breach, they should seek senior management support.

Failure to comply with this policy may lead to a lack of clarity around expected standards of performance and training needs in relation to job role, resulting in reduced effectiveness or efficiency, underperformance and putting service delivery at risk.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with CGSL's Disciplinary Policy up to and including dismissal.

Implementation of the Policy

Overall responsibility for implementing and reviewing the policy lies with the Director. However, all employees are required to adhere to and support the implementation of the policy. CGSL

Anti-Bribery Policy



will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the company.

This policy will be implemented through the development and maintenance of procedures during appraisals and one-to-one meetings. Guidance will be provided to both managers and employees on the process.