

POLICY NAME:	ANTI-BRIBERY AND CORRUPTION	DATE:	FEBRUARY 2026
POLICY REVISION:	03	BY	JONATHAN CLARK
REVIEW PERIOD:	ANNUALLY	REVIEW:	FEBRUARY 2027



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1. AMENDMENTS AND UPDATES

ISSUE	DATE	AMENDMENT / CHANGE
FIRST	Unknown	All previous versions saved in 'Archive' server
02	Jan 2026	Template, wording and sections, part of GFS improvement process.
03	Fe b 2026	Added section 8.1, amended section 5, added section 7.1

2. PURPOSE

The purpose of this policy is to define Glass and Framing Solutions Limited's commitment to establish clear expectations for ethical conduct across all business operations.

The company is committed to acting with integrity, transparency, and accountability, and to complying with all relevant anti-bribery and anti-corruption legislation, including the UK Bribery Act 2010.

This policy aims to:

- Prevent, detect, and respond to any form of bribery or corruption.
- Protect the company's reputation and stakeholder confidence.
- Provide practical guidance on identifying and managing potential bribery risks.

3. SCOPE

This policy applies to:

- All employees, directors, and officers of Glass and Framing Solutions Limited.
- Contractors, consultants, agents, intermediaries, suppliers, joint-venture partners, and any third party acting on behalf of the company, regardless of location.

It covers all business dealings, transactions, and relationships with both public and private entities conducted in the name of the company.

4. DEFINITIONS

Bribery is the offering, giving, receiving, or soliciting of any item of value to influence the actions or decisions of an individual in a position of trust.

Corruption is the abuse of entrusted power for private gain and may include bribery, fraud, extortion, nepotism, embezzlement, or facilitation payments.

Examples of bribery include:

- Cash or cash equivalents (e.g. gift cards, vouchers).
- Lavish gifts, entertainment, or hospitality.
- Favourable treatment, contracts, or promotions offered as inducements.
- "Facilitation payments" made to speed up routine governmental actions.

5. POLICY STATEMENT

Glass and Framing Solutions Limited maintain a zero-tolerance approach to bribery and corruption, and we are fully committed to full compliance with the UK Competition Act 1998. We ensure fair competition by prohibiting any "anti-competitive behaviour" that restricts, distorts, or prevents competition in the UK market.

Prohibited Conduct (Avoidance): To avoid anti-competitive behaviour, all employees and third parties are strictly prohibited from:

- **Price Fixing:** Discussing or agreeing on prices, discounts, or credit terms with competitors.

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- **Bid Rigging:** Colluding with other manufacturers or contractors on tenders or quotes to decide who will win the contract.
- **Market Sharing:** Agreeing with competitors to divide territories, customers, or specific types of projects.
- **Information Exchange:** Sharing sensitive commercial information (e.g. costs, production volumes, or future strategies) with competitors, including at trade association meetings.
- **Prohibition of Bribery:** No employee or associated person shall offer, give, request, or accept a bribe, directly or indirectly, under any circumstances.
- **No Facilitation Payments:** Unofficial payments to secure or accelerate routine actions are strictly prohibited. The only exception is where personal safety is at immediate risk; such instances must be reported to management without delay.
- **Gifts and Hospitality:** Reasonable and proportionate hospitality is acceptable only when it is clearly for legitimate business purposes and not intended to influence a decision. Any gift or hospitality above the company's defined threshold must receive prior approval from senior management and be fully recorded.
- **Political and Charitable Contributions:** The company does not make political donations. Charitable donations and sponsorships must be transparent, properly authorised, and never used to gain improper advantage.

6. THIRD-PARTY RELATIONSHIPS

Third parties acting on behalf of Glass and Framing Solutions Limited are expected to uphold equivalent standards of integrity.

- **Due Diligence:** Appropriate due diligence must be conducted prior to engagement, including verification of ownership, reputation, and compliance history.
- **Contractual Requirements:** All agreements must include anti-bribery clauses requiring adherence to this policy and relevant laws.
- **Monitoring and Audit:** The company reserves the right to audit, review, or terminate any relationship where bribery or corruption is suspected or proven.

7. REPORTING AND WHISTLEBLOWING

Glass and Framing Solutions Limited promotes an open and accountable culture.

- **Reporting Channels:** Concerns or suspicions of bribery or corruption should be reported to a line manager, senior management, or via the confidential whistleblowing channel. Reports may be made anonymously.
- **Protection from Retaliation:** No individual will suffer retaliation or detriment for raising a genuine concern in good faith.
- **Confidentiality:** All reports will be treated confidentially and investigated promptly and fairly.

7.1 INVESTIGATING ANTI-COMPETITIVE BEHAVIOUR

Any suspected breach of competition law or anti-competitive practice must be reported immediately through the channels noted in Section 7.

- **Investigation:** All reports of anti-competitive behaviour will be investigated by Senior Management or an external legal advisor to determine the extent of the breach.
- **Evidence Preservation:** All relevant documentation, including emails and meeting notes, will be secured to assist in the investigation.
- **Regulatory Liaison:** If a breach is confirmed, Glass and Framing Solutions Limited will determine if a voluntary disclosure to the Competition and Markets Authority (CMA) is required.

8. RECORD KEEPING

Accurate record-keeping is essential to demonstrate compliance.

- All financial transactions must be fully and transparently documented.
- Gifts, hospitality, and expenses must be recorded in accordance with company policy.
- Adequate audit trails must exist for all key business decisions.
- All relevant records must be retained for the legally required period or longer if specified by company policy.

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8.1 INTERNAL CONTROLS AND FRAUD PREVENTION

Glass and Framing Solutions Limited shall maintain a robust system of internal financial controls to prevent and detect fraud or malpractice. This includes:

- **Segregation of Duties:** Ensuring no single individual has total control over a financial transaction from start to finish.
- **Regular Audits:** Conducting periodic internal and external audits of financial records to identify any irregularities or potential malpractice.
- **Verification Processes:** Requiring dual authorisations for all payments above a defined threshold and verifying all new supplier bank details independently.

9. TRAINING AND AWARENESS

- **Mandatory Training:** All employees must complete anti-bribery and corruption training as part of induction and refresher programmes.
- **Ongoing Awareness:** Updates will be provided to reflect changes in legislation, emerging risks, and best practice.

10. RESPONSIBILITIES

- **Directors:** Approve and oversee implementation of this policy, ensuring adequate resources and governance.
- **Managers:** Promote compliance within their teams, ensure staff are trained, and monitor adherence.
- **Employees and Associated Persons:** Must understand, comply with, and report any suspected breaches of this policy.
- **Third Parties:** Must agree to the same standards as part of their contractual terms.

11. NON-COMPLIANCE

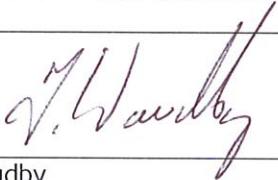
Violations of this policy are treated as serious misconduct.

- Employees found to have breached this policy may face disciplinary action, including dismissal, and may also be subject to criminal prosecution.
- Contracts with third parties may be terminated immediately, and legal action may be taken where appropriate.

12. REVIEW AND CONTINUOUS IMPROVEMENT

This policy will be:

- Reviewed annually by Senior Management or more frequently if legislation or business operations change.
- Updated as necessary to ensure continued compliance and effectiveness.
- Supported by periodic audits and feedback mechanisms to identify and address potential weaknesses.

SIGNED:	
NAME:	Tony Waudby
TITLE:	Managing Director
SIGNED FOR:	Glass and Framing Solutions Limited
DATE:	24 th February 2026