



Just Surveys Limited

Drain Survey Specialists

Dexters 1, Linton Farm

Highnam, Gloucester

Gloucestershire, GL2 8DF

Telephone: 01452 730185

Email: enquiries@just-surveys.co.uk

Website: just-surveys.com

Anti-Bribery & Anti-Corruption Policy

This anti-bribery policy exists to set out the responsibilities of Just Surveys Ltd, and those who work for us, to observe and uphold our zero-tolerance position on bribery and corruption.

Just Surveys Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. We have zero-tolerance for bribery and corruption, and we are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

We are committed to upholding all laws relating to anti-bribery and corruption, including the Bribery Act 2010.

Just Surveys Ltd recognises that bribery and corruption are punishable by up to ten years of 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. We commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us.

Employee Responsibilities

As an employee of Just Surveys Ltd, you agree that you will not offer, promise, give, request, agree to receive, or accept any bribes:

- in the course of your employment;
- when conducting Company business; or
- when representing the Company in any capacity.

A bribe means a financial payment or other form of reward or advantage, whether direct or indirect, that is intended to induce or influence, or has the effect of inducing or influencing, an individual, company or public body to perform their functions, including business and public duties, improperly. For the avoidance of doubt, improper performance includes:

- not acting in good faith;
- not acting impartially; and
- not acting in accordance with a position of trust.

You agree to comply with the Company's anti-bribery policy and procedures that are in force from time to time.

You agree to comply with all applicable bribery and corruption laws.

You agree that you will report any suspicious conduct that may amount to a bribe being offered, promised, given, requested or accepted (either involving you or another employee or person acting for, or on behalf of, the Company) immediately to the relevant individuals within the Company in accordance with the anti-bribery policy.

If the Company suspects you of bribery, it is entitled to invoke its disciplinary procedures and suspend your





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employment while carrying out its investigations.

The Company is entitled to terminate your employment in writing without notice or pay in lieu of notice, without prejudice to any rights or claims it may have against you, if it is found by the Company, or any other relevant public or legal authority, that you are guilty of bribery.

What to do if you are a victim of bribery or corruption

You must tell your line manager 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

Just Surveys Ltd understands that you may feel worried about the potential repercussions should you refuse a bribe or report a concern. We will support anyone who raises concerns in good faith under this policy. We will ensure no-one suffers any detrimental treatment.

Training

Just Surveys Ltd will provide training on this policy to all employees.

Communication

Just Surveys Ltd will communicate to all suppliers, contractors and business partners at the outset of business that they are committed to zero-tolerance regarding bribery and corruption.

Record keeping

Just Surveys Ltd 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 managerial review.

Monitoring and reviewing

Just Surveys Ltd is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. Any required improvements will be applied as soon as possible. Employees 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 your line manager.

This policy does not form part of an employee's contract of employment and we may amend it at any time to improve its effectiveness.

Reviewed 13/01/2025

