

ANTI-BRIBERY, CORRUPTION AND ETHICAL BUSINESS POLICY

This document sets out our company policy in relation to anti-bribery and corruption and ethical business matters. Compliance with this policy is mandatory for all employees and any person working on behalf of Cable Services Ltd.

Cable Services Ltd is committed to conducting business in an ethical and honest manner. We will ensure that bribery and corruption is prevented. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

We will comply with 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, regarding our conduct both at home and abroad.

We recognise that bribery and corruption are punishable by up to ten years of imprisonment and/or 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. It is with this in mind that we commit to effectively preventing bribery and corruption across our business.

What is and is not acceptable:

Gifts and hospitality:

Cable Services Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) if they are made/received in line with the following:

- 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.
- It is not made with the suggestion that a return favour is expected.
- 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, considering 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 is not above a certain excessive value, as pre-determined by the Managing Director (usually in excess of £100).
- 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 or hospitality (e.g. when meeting with an individual of a certain religion/culture who may take offence), the gift or hospitality may be accepted so long as it is declared to the Managing Director without delay.

If in doubt, the Managing Director must be consulted in relation to all offers of gifts or hospitality received or made by Cable Services Ltd.

Facilitation Payments and Kickbacks:

Cable Services Ltd strictly prohibits 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.

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

Any attempt to offer a facility or kickback payment must be reported without delay to the Managing Director.

Political Contributions:

Cable Services Ltd 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:

Cable Services Ltd accepts and encourages donations to registered charities. All charitable donations must be approved by the Managing Director. We will ensure that all charitable donations made are legal and ethical under local laws and practices.

Employee responsibilities:

All employees of Cable Services Ltd are expected to comply with the requirements of this policy. Any suspected breaches of this policy must be reported without delay to the Managing Director. Suspected breaches will be investigated in accordance with our disciplinary procedures and may result in dismissal, in accordance with our zero-tolerance policy.



Jason Bostock
Managing Director.