225 FIRE SOLUTIONS LTD
Fire Safety And Risk Assessment Specialists

Anti-Bribery & Corruption Policy – 225 Fire Solutions Ltd

1. Policy statement

225 Fire Solutions Ltd is committed to the highest standards of integrity and ethical behaviour. Bribery and corruption are strictly prohibited. This policy sets out controls to prevent, detect and respond to bribery risks in our activities.

2. Scope

Applies to all employees, officers, contractors, consultants and agents acting for or on behalf of 225 Fire Solutions Ltd worldwide.

3. What constitutes bribery

Bribery is offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage to improperly influence a person to obtain or retain business, a business advantage, or to secure an improper performance of a function.
Examples: cash or gifts to influence decisions, excessive hospitality, facilitation (grease) payments, kickbacks, or payments to third parties where proceeds are used for bribery.

4. Prohibited conduct

No employee or representative shall offer, give, request or accept bribes, facilitation payments or improper gifts or hospitality.
No indirect bribery through intermediaries, agents or third parties.
Political donations, charitable contributions or sponsorships must not be used as a means to conceal bribery.

5. Responsibilities

- Directors:

Provide leadership, resources and oversight of anti-bribery controls and investigations.
Ensure policy is maintained and enforced.
Maintain procedures, conduct risk assessments, oversee training and record-keeping.
Lead investigations and ensure corrective actions.

- Employees and representatives:

Comply with this policy, attend required training, report concerns and cooperate with investigations.
Conduct business ethically and avoid conflicts of interest.

6. Controls to prevent and identify bribery risks

- Risk assessment:
Conduct periodic bribery risk assessments focused on sectors, client types, geographies and activities (e.g., regulatory interactions, permits).

- Policies and procedures:
Maintain written procedures for gifts & hospitality, expenses, procurement, approvals and interactions with public officials.

- Gifts & hospitality:
Allow only modest, appropriate, infrequent gifts and hospitality that are transparent, proportionate and approved by line manager where required. Any giving or receiving must be recorded.

- Prohibit cash gifts and any gift or hospitality that could reasonably be seen to influence a business decision.

- Approval and recording:
Require pre-approval for hospitality or gifts above a defined monetary threshold (set by management).
Maintain a register of gifts, hospitality, and any third-party payments.

- Third parties:
Although 225 Fire Solutions Ltd currently does not have a supply chain, any future engagement of agents, consultants or third parties must include written anti-bribery clauses, contractual warranties, and proportionate due diligence (see Due Diligence).

- Financial controls:
Ensure proper segregation of duties, transparent invoicing, and approval of payments.

- Whistleblowing and reporting:
Provide confidential reporting channels for suspected bribery. Protect whistleblowers from retaliation.

- Training and communication:
Provide periodic anti-bribery training to all staff and to anyone who may interact with public officials or contracting processes.

- Record keeping:
Keep accurate records of transactions, approvals, gifts & hospitality registers, due diligence checks and investigation outcomes.

Due diligence (note on supply chain)
- Current status: 225 Fire Solutions Ltd does not maintain a supply chain.

Future engagements: before appointing any supplier, agent or intermediary, conduct proportionate due diligence including:
- Verify identity and business legitimacy.
- Confirm reputations, relevant sanctions checks, adverse media screening.
- Require contractual anti-bribery warranties and audit/cooperation rights.
- Assess the third party's own controls and provide training where necessary.

- Document findings and reserve the right to refuse or terminate relationships where unacceptable bribery risk exists.

7. Detection and reporting

Employees must report suspected bribery, corruption or related misconduct immediately to their manager, the H&S & Operations Lead or the Director.
Reports may be made confidentially; retaliation against reporters is prohibited.
Management will log all reports and maintain an investigation record.

8. Investigation of alleged bribery

All allegations will be recorded, acknowledged and assessed promptly.
Investigations will be conducted fairly, promptly and confidentially by management, with external investigators engaged where appropriate.
Preserve evidence and maintain chain of custody for documents.
Cooperate with law enforcement and regulatory authorities as required.
If bribery is substantiated, take proportionate disciplinary action, which may include termination and referral for criminal prosecution.

9. Sanctions and disciplinary action

- Breaches of this policy are grounds for disciplinary action up to and including dismissal and may lead to civil or criminal prosecution.

10. Monitoring, review and audit

- The directors will review this policy annually and after any significant incident or change in operations.
- Management will maintain records of training, risk assessments, registers and investigations and will audit compliance periodically.

11. Contact and reporting

Report concerns or request guidance to: [Ryan Beard or Max Dolby], Director, 225 Fire Solutions Ltd
-For confidential reporting: [internal confidential channel if available].

12. Approval and review

This policy is approved by the director(s) of 225 Fire Solutions Ltd and will be reviewed at least annually.

Signed:
Ryan Beard and Max Dolby.
Title: Director, 225 Fire Solutions Ltd
DATE : 01/April/2022

Reviewed annually.