



The Callver Group Ltd

01923 750510

team@callver.com

www.callver.com



Anti-Bribery & Corruption:

The Callver Group Ltd T/A The Callver Cleaning Co

2025- 2026

Our Commitment

At The Callver Group Ltd, we are committed to conducting business ethically, honestly, and transparently. We take a zero-tolerance approach to bribery and corruption, complying fully with the UK Bribery Act 2010 and all other relevant legislation. We believe in doing the right thing – not just because it's the law, but because it reflects our values as a responsible and trustworthy company.

Scope and Purpose of This Policy

This policy outlines:

- Our position on bribery and corruption
- What is and isn't acceptable behaviour
- Responsibilities of employees and others working on our behalf
- Reporting and whistleblowing guidance

It applies to all employees, contractors, agency staff, suppliers, business partners, and third-party representatives, wherever they are located, and covers all areas of our operations.

What is Bribery?

Bribery is offering, giving, receiving, or soliciting something of value (a gift, money, service, or favour) to influence a decision or secure an unfair advantage.

Examples include:

- Paying someone to award a contract
- Accepting hospitality in return for preferential treatment
- Offering a government official money to fast-track services

Bribery can be direct or indirect (e.g. through an agent), and both giving and receiving a bribe are offences.

Unacceptable Practices

We do not allow:

- Giving or receiving bribes in any form
- Facilitation payments (small payments to speed up routine government actions)
- Kickbacks (payments for business favours)
- Political donations intended to influence business outcomes
- Charitable contributions used to mask bribery

Acceptable Business Conduct

Reasonable, proportionate gifts and hospitality are allowed only if:

- They are not intended to improperly influence a decision
- They are of modest value and culturally appropriate
- They are transparent, recorded, and approved if necessary

If in doubt, employees must seek advice from their line manager or compliance contact before accepting or offering anything of value.

Third Parties

We require third parties we work with (suppliers, subcontractors, agents, etc.) to adhere to our anti-bribery standards. Contracts must include appropriate clauses and provisions.

Responsibilities

Everyone working with or for The Callver Group Ltd must:

- Read, understand, and comply with this policy
- Refuse any act of bribery and report concerns immediately
- Complete any required anti-bribery training

Line managers must ensure their teams understand their responsibilities and have access to appropriate support.

Reporting Concerns

Concerns about bribery or corruption can be raised through:

- Your line manager
- A company director
- Our Whistleblowing Policy

We encourage openness and support anyone raising concerns in good faith. No employee will face retaliation for doing the right thing.

Breaches and Consequences

Any employee who breaches this policy may face disciplinary action, including dismissal for gross misconduct. We may terminate contracts with any third party found to be in violation.

Training and Awareness

- Training is provided to all staff at induction and reviewed regularly
- Updates and refreshers are delivered via internal communications
- Anti-bribery messaging is reinforced with suppliers and partners at the start of every working relationship

Record Keeping

We maintain:

- Transparent and accurate records of all gifts, expenses, and hospitality
- Financial records that clearly explain all payments made and received

Monitoring and Review

This policy is monitored by our Compliance Manager and reviewed annually. Internal controls and procedures are audited regularly for effectiveness.

Final Word

Bribery and corruption damage trust, reputation, and communities. We are committed to preventing both in all areas of our work. For questions, training, or guidance, contact team@callver.com.

Let's keep Team Callver ethical, transparent, and trusted. **Always.**