

# Anti Bribery and Corruption Policy

## 1. Policy Statement

Rosbo LTD operates a zero-tolerance approach to bribery and corruption.

We are committed to conducting all business honestly, transparently and ethically. We will not offer, give, request or accept bribes in any form, whether directly or indirectly.

We are committed to complying fully with the Bribery Act 2010 and implementing effective systems to prevent bribery within our business and supply chain.

This policy applies to:

- Directors
- Employees
- Subcontractors
- Agents
- Consultants
- Suppliers
- Any third party acting on behalf of Rosbo LTD

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## 2. What is Bribery?

Bribery is the offering, promising, giving, accepting or soliciting of an advantage to influence improper performance of a duty.

Under the Bribery Act 2010, offences include:

- Offering or giving a bribe
- Requesting or accepting a bribe
- Bribing a foreign public official
- Failure of a commercial organisation to prevent bribery

Bribes may involve:

- Money
- Gifts
- Hospitality
- Discounts
- Favourable treatment
- Employment opportunities
- Services or other advantages

## **Rosbo LTD T/A Rosbo Roofing, Carpentry & Skylights**

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Even small or informal payments can constitute bribery if intended to influence behaviour improperly.

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### **3. Our Commitment**

Rosbo LTD will:

- Never offer or accept bribes
- Not make facilitation payments
- Conduct business fairly and transparently
- Keep accurate financial records
- Perform due diligence on suppliers and subcontractors
- Encourage reporting of concerns

We expect the same standards from all parties we engage.

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### **4. Facilitation Payments**

Facilitation payments are unofficial payments made to secure or expedite routine governmental or administrative actions.

Rosbo LTD strictly prohibits facilitation payments.

If a demand for such payment is made:

- The individual should refuse where safe to do so
  - Report the incident to the Director immediately
  - Record the details of the request
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### **5. Gifts & Hospitality**

Reasonable and proportionate hospitality may be acceptable if it is:

- Transparent
- Modest in value
- Given openly
- Not intended to influence a business decision

Unacceptable examples include:

- Cash or cash equivalents
- Excessive hospitality

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- Gifts during tender processes
- Personal payments



## **Record Keeping**

All gifts and hospitality offered or received of significant value must be:

- Declared to the Director
- Recorded in a Gifts & Hospitality Register

Where there is doubt, the Director must approve the hospitality in advance.

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## **6. Procurement & Tendering**

During tendering or procurement processes, Rosbo LTD will:

- Compete fairly
- Not offer incentives to secure contracts
- Avoid conflicts of interest
- Ensure transparency in pricing

Any attempt to influence decision-makers improperly must be reported immediately.

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## **7. Conflicts of Interest**

Employees and subcontractors must:

- Declare personal interests that may conflict with company interests
- Avoid situations where impartiality may be compromised

Examples include:

- Family relationships with suppliers
- Financial interests in competitor organisations
- Undisclosed side arrangements

Conflicts must be disclosed to the Director promptly.

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## **8. Financial Controls & Record Keeping**

Rosbo LTD will maintain accurate and transparent accounting records.

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We will:



- Record all payments properly
- Avoid off-the-book accounts
- Ensure invoices reflect legitimate services
- Prohibit false expense claims

Robust record keeping helps prevent and detect bribery.

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## 9. Supplier & Subcontractor Due Diligence

We will:

- Engage reputable suppliers
- Avoid working with organisations suspected of unethical practices
- Require subcontractors to operate lawfully
- Terminate relationships if bribery is suspected

Where necessary, we may request written confirmation of compliance with anti-bribery standards.

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## 10. Reporting Concerns

All individuals are encouraged to report concerns regarding bribery or unethical conduct.

Reports should be made to the Director.

Reports will:

- Be treated confidentially
- Be investigated fairly
- Be handled without retaliation

No employee or subcontractor will suffer detriment for raising a genuine concern in good faith.

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## 11. Consequences of Breach

Any breach of this policy may result in:

- Disciplinary action
- Termination of employment or subcontract
- Reporting to authorities

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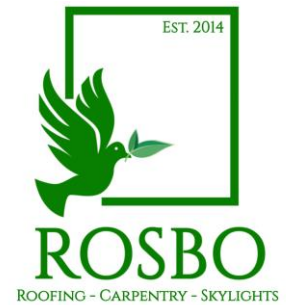
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- Legal action



Bribery is a criminal offence and may result in significant fines or imprisonment.

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## **12. Risk Areas in Construction**

We recognise potential bribery risks within the construction sector may include:

- Securing planning approvals
- Tender awards
- Supplier incentives
- Contract variations
- Cash payments

Rosbo LTD operates strict oversight to prevent improper conduct in these areas.

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## **13. Training & Awareness**

The Director is responsible for ensuring:

- Awareness of anti-bribery obligations
- Understanding of acceptable hospitality
- Monitoring compliance

Regular review of procedures ensures ongoing compliance.

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## **14. Monitoring & Review**

This policy will be:

- Reviewed annually
- Updated following legislative changes
- Revised if risk exposure changes
- Reviewed following any incident

The Director has overall responsibility for implementation and enforcement.

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## **15. Commitment to Ethical Business**

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Rosbo LTD is committed to maintaining:

- Integrity
- Transparency
- Accountability
- Professional conduct

We believe ethical business practices are essential to long-term success and trust with clients, suppliers and regulatory bodies.

