



# Anti Bribery and Corruption Policy

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Cox Management Services Ltd is the holding company for its associated trading companies inclusive but not limited to Cox Skips Ltd and The Recycling Partnership Ltd, which are collectively referred to within this policy as the Cox Group and The Company.

This anti-bribery and corruption policy exists to set out the responsibilities of The Company and those who work for us with regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for The Company. It will help them to recognise and deal with bribery and corruption issues, and to understand their responsibilities.

The Cox Group is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. The Company has zero-tolerance for bribery and corrupt activities. The Company is committed to acting professionally, fairly and with integrity in all business dealings and relationships.

The Cox Group will uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. The Company is bound by the laws of the UK, including the Bribery Act 2010.

The Cox Group recognises that bribery and corruption are punishable on conviction on indictment, to imprisonment for a term, not exceeding 10 years, or to a fine, or to both. If The Company is discovered to have taken part in corrupt activities, they may be subjected to an unlimited fine, be excluded from tendering for public contracts and face serious damage to their reputation. With this in mind, The Cox Group commit to preventing bribery and corruption in their business and take their 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 (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organisation The Company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.



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Any arrangements The Company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

## **Definition of bribery**

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from The Company's Finance Manager.

## **Gifts and hospitality**

The Cox Group accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. 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.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the company, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. 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).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a certain excessive value, as pre-determined by the company's Finance Manager (usually in excess of £100).



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- k. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Finance Manager.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Finance manager, who will assess the circumstances.

The Company recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Finance Manager. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Finance Manager should be sought.

## **Facilitation Payments and Kickbacks**

The Cox Group does not accept and will not make 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. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

The Cox Group does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

The Cox Group recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to your line manager.



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## **Political Contributions**

The Cox Group will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. The Company recognise this may be perceived as an attempt to gain an improper business advantage.

## **Charitable Contributions**

The Cox Group accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

The Cox Group will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Finance manager.

## **Competition Law**

The Cox Group are committed to ensuring that as a company and as individuals we comply with various legal rules around the world which are designed to ensure that market competition, nationally and internationally, is not restricted, prevented or distorted.

## **Employee Responsibilities**

As an employee of The Cox Group, employees must ensure that they read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information they are given.

All employees and those under The Company's control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If any employee has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must notify the Finance Manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The disciplinary procedure will be carried out as per The Employee Handbook (QSS 501). The Cox Group has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.



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If anyone suspects that there is an instance of bribery or corrupt activities occurring in relation to The Cox Group, they are encouraged to raise their concerns at as early a stage as possible. If they are uncertain about whether a certain action or behaviour can be considered bribery or corruption, they should speak to their line manager, the Finance Manager or Directors.

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

The Finance Manager must be informed as soon as possible if an employee is offered a bribe by anyone, if an employee is asked to make one, if any employee suspects that they may be bribed or asked to make a bribe in the near future, or if the employee has reason to believe that they are a victim of another corrupt activity.

## **Protection**

If an employee refuses to accept or offer a bribe or they report a concern relating to potential act(s) of bribery or corruption, The Cox Group understands that they may feel worried about potential repercussions. The Cox Group will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

The Cox Group will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If an employee has reason to believe they have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, they should inform their line manager or the Finance Manager immediately.

## **Training and communication**

The Cox Group will provide training on this policy as part of the induction process for all new employees. The Cox Group Anti Bribery and Corruption Policy and zero tolerance attitude will be made available to all suppliers, contractors, business partners and any third party upon request and via the relevant web sites.

The Cox Group will provide relevant anti-bribery and corruption training to employees where The Company feels their knowledge of how to comply with the Bribery Act needs to be enhanced.

## **Record keeping**

The Cox Group will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. The Company will declare and



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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**

The Cox Group's Finance Manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for 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 the Finance manager.

This policy does not form part of an employee's contract of employment and The Cox Group may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

A handwritten signature in black ink, appearing to read 'Jason Taylor'.

Jason Taylor  
Director