



Bribery and Corruption Policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and in implementing and enforcing effective systems to counter bribery.

Where deemed necessary we will provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

Bribery and corruption are punishable for individuals by up to ten years imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously and we have conducted a risk assessment to identify any key areas, which may potentially pose a particular risk to our organisation.

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might lead to a breach of this policy.

Relevant legislation

- Bribery Act 2010

How JOS Structures Ltd addresses the risk of bribery

- **Proportionality** – the company only trades in the UK, it has a very small management structure and it operates in markets where bribery is not prevalent. The risk of bribery is very limited.
- **Top level commitment** – both John O’Sullivan and Anita O’Sullivan will not tolerate bribery.
- **Risk assessment** – given the current operation of the company, and the fact that it is limited to trading within the UK, the risk of bribery is low to insignificant. Should the company operations change significantly, or the company start to operate outside the UK, then a more detailed risk assessment will be carried out.
- **Due diligence** – we will carry out appropriate checks where we feel appropriate, before engaging others to represent us in business dealings.
- **Communication** – given the low level of risk, we will limit communication to the publication of our policy. Should we ever be faced by a higher risk then we would raise awareness by suitable training.
- **Monitoring and review** – we will routinely review this policy on an annual basis. Should the level of bribery risk change, then more frequent review may be necessary.

Signed

J O Sullivan

Date

23rd August 2024

Signed

A O Sullivan

Date

23rd August 2024