

## INTRODUCTION

Cleansing Service Group (CSG) is committed to applying the highest standards of ethical conduct and integrity in its business activities. Every employee and individual acting on CSG's behalf is responsible for maintaining CSG's reputation and for conducting company business honestly and professionally.

CSG considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

CSG benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the waste sector. Where there is a level playing field, CSG can lead the market through innovation in the portfolio of services we offer, through industry leading waste treatment and recycling initiatives and outstanding customer service.

Transparent, fair conduct helps to foster deeper relationships of trust between CSG and business partners and customers. It is vital for CSG's reputation and future growth.

## SCOPE

CSG does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, managers, agents or consultants or any persons or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout CSG to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

CSG has issued a new anti-bribery policy outlining the organisation's position on preventing and prohibiting bribery on Sharepoint, notice boards and by email to all employees. The anti-bribery policy applies to all employees, including those of any subsidiary, as well as agency workers, consultants and contractors. All employees and other individuals acting for CSG are required to familiarise themselves and comply with the organisation's anti-bribery policy with immediate effect.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on the behalf of CSG are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, CSG is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with CSG's procedure.

A breach of CSG's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for CSG should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

CSG will not conduct business with service providers, agents or representatives that do not support our organisation's anti-bribery objectives. CSG reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, CSG with immediate effect where there is evidence that they have committed acts of bribery.

The success of CSG's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and other acting for, or on the behalf of, CSG are encouraged to report any suspected bribery in accordance with the procedures set out in the anti-bribery policy. CSG will support any individuals who make such a report, provided that it is made in good faith.

## RELATED LAW

### Bribery Act 2010

The Bribery Act 2010 introduces new criminal offences for bribery for both individuals and companies. The Act is in force from 1 July 2011.

The Bribery Act 2010 replaces the previous main statutory authorities on bribery and creates several new criminal corporate offences. Employees are advised to review and update their anti-bribery measures for the Bribery Act 2010.

**The Group consists of Cleansing Service Group Ltd. and its Subsidiary Companies.**

*The controlled version of this document is available only on Sharepoint*

SECTION: POLICIES

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PAGE: 2 OF 2

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