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SPECIALIST SURVEY CONTRACTORS

ANTI-BRIBERY AND COMPETITION LAW POLICY

Introduction

The Company is committed to implementing and enforcing effective systems to prevent bribery and ensure compliance with all applicable competition laws. It is the Company's policy to conduct all aspects of its business honestly, ethically and in full compliance with all relevant legal and regulatory requirements.

Under the UK Bribery Act 2010, bribery and corruption are criminal offences punishable by up to ten years' imprisonment for individuals. If the Company is found to have participated in bribery or corruption, or has failed to maintain adequate procedures to prevent bribery, it could face unlimited fines and be excluded from tendering for Government contracts.

What is Competition Law?

Survey Design Services & Associates Ltd requires compliance with all applicable competition laws. This policy extends to all business dealings and transactions in every country in which we operate.

All directors, employees, temporary personnel, contract personnel, consultants, intermediaries, agents and third parties acting on behalf of Survey Design Services & Associates Ltd are required to comply with this policy.

Failure to comply with competition law can have serious consequences, including:

- Significant fines.
- Criminal prosecution resulting in fines or imprisonment.
- Legal actions for compensation.
- Contracts being declared void or unenforceable.
- The Company being prohibited from participating in public tenders.

Policy

The aim of this policy is to help the Company comply with the Bribery Act 2010 and all applicable competition laws, maintain the highest standards of business conduct, and demonstrate the Company's zero-tolerance approach to bribery, corruption and anti-competitive behaviour.

This policy applies to all permanent and fixed-term staff employed by the Company, together with any contractors, consultants or other persons acting for or on behalf of the Company.

The Company will not:

- Make contributions of any kind for the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly or influencing a public official in the performance of their duties.
- Make or accept kickbacks of any kind.

Reasonable and proportionate hospitality or legitimate business expenditure is not prohibited by the Bribery Act 2010, provided it is not intended to improperly influence a business decision.

Company Responsibility

The Company will:

- Keep appropriate internal records that evidence the business reasons for any payments made to third parties.
- Encourage employees to raise concerns about any issue or suspicion of bribery, corruption or anti-competitive conduct at the earliest opportunity.
- Ensure that anyone raising a genuine concern will not suffer any detriment, even if their concern ultimately proves to be unfounded.
- Promote awareness of competition law and ensure appropriate controls are in place to minimise compliance risks.

To prevent bribery and competition law breaches, we will:

- Assess business activities to identify bribery and competition law risks and implement controls proportionate to those risks.
- Demonstrate a clear commitment to preventing bribery, corruption and anti-competitive behaviour.
- Carry out appropriate due diligence on suppliers, customers, agents and business partners.
- Communicate this policy and provide appropriate training and awareness.
- Monitor and review procedures regularly to ensure they remain effective.

Employee Responsibility

Employees must not:

- Accept any financial or other reward in return for providing a favour.
- Request any financial or other reward in return for providing a favour.
- Offer any financial or other reward in return for providing a favour.
- Discuss pricing, costs, margins, customers, territories, tenders or other commercially sensitive information with competitors unless expressly authorised and legally permitted.
- Participate in any arrangement that could restrict competition or breach applicable competition laws.

Employees are expected to seek guidance from management if they are unsure whether any activity may breach this policy.

Non-Compliance

All employees have a responsibility to comply with and support this policy and to report any suspected breaches.

If employees feel concerned about raising an issue directly, they should seek support from the Company Director or another member of senior management.

Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Where appropriate, the Company may report suspected criminal offences or regulatory breaches to the Police or the relevant enforcement authority.

Implementation of the Policy

Overall responsibility for implementing and reviewing this policy rests with the Company Director. However, every employee is responsible for complying with and supporting the implementation of this policy.

All existing employees will be informed of this policy, and all new employees will receive a copy during their induction.

This policy will be implemented through appropriate procedures, including employee appraisals, one-to-one meetings, management guidance and regular training where appropriate.

Monitoring

The Company will monitor compliance with this policy on an ongoing basis to assess its effectiveness and identify opportunities for continual improvement.

Review

This policy will be reviewed at least annually and revised where necessary to reflect legislative changes, best practice or organisational requirements.

Policy Amendments

Where amendments or updates are made to this policy, the Company will ensure that all relevant employees are informed. This may include written communications and additional training where appropriate.

Additional Information

If you require further information or clarification regarding this policy, please contact your manager.

If you are dissatisfied with any decision made in relation to this policy, you should follow the Company's Grievance Procedure.

Where this policy reflects statutory requirements, it will automatically be interpreted in accordance with any future legislative changes.

Signed: 

Hannah Weigh
Role: Director
Survey Design Services & Associates Ltd
Date: July 2026