



FLAMESTAR LTD

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ANTI-BRIBERY AND CORRUPTION POLICY

Document Reference:	ABC-POL-010	Version:	1.2
Issue Date:	April 2026	Review Date:	April 2027
Approved By:	Amandeep Singh, Director	Classification:	Company Policy
Status:	Active	Applications To:	All Staff, Directors & Supply Chain

1. PURPOSE

This policy sets out our organization's commitment to conducting all business activities with the highest standards of integrity, transparency, and ethical conduct. We operate a strict zero-tolerance approach to bribery and corruption in all its forms, whether direct or indirect, in the United Kingdom and in any other jurisdiction in which we operate or seek to operate.

This policy has been prepared in accordance with the Bribery Act 2010 and reflects our obligations under that legislation. It is designed to protect our organization, our employees, our supply chain, and the public sector clients and housing associations we serve.

2. SCOPE

This policy applies to all people working for or on behalf of our organization, including:

- All directors, officers, and senior management
- All permanent, temporary, and agency employees
- Subcontractors, consultants, and specialist labor providers
- Supply chain partners and material suppliers
- Any third party acting as an agent or representative of the organization
- Joint venture partners and consortium members



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This policy covers all business activities, contracts, and procurement processes, including tendering for public sector frameworks, DPS arrangements, housing association contracts, and main contractor supply chain appointments.

3. RESPONSIBILITIES

Role / Stakeholder	Responsibility
Director / CEO	Ultimate responsibility. Drives ethical culture and approves policy updates.
Senior Management	Embeds policy within their areas; ensures team awareness and compliance.
Compliance Lead	Maintains and reviews the policy; primary contact for reporting and investigations.
All Employees	Read, understand, and comply; must report any suspected breach immediately.
Subcontractors & Supply Chain	Comply as a condition of appointment; non-compliance may result in termination.
HR Department	Supports training delivery, record-keeping, and contract / induction alignment.

4. POLICY STATEMENT & PROCEDURES

4.1 Definition of Bribery and Corruption

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical, or a breach of trust. Corruption is the misuse of entrusted power for private gain. This includes, but is not limited to:

- Offering, promising, or giving a financial or other advantage to induce improper conduct
- Requesting, agreeing to receive, or accepting an advantage in return for improper conduct
- Bringing a foreign public official
- Facilitation payments — unofficial payments to secure or expedite routine official actions
- Kickbacks — payments made to secure or retain a contract or favor
- Gifts, hospitality, or entertainment intended to improperly influence a business decision



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4.2 Zero-Tolerance Commitment

We will not engage in, facilitate, or tolerate bribery or corruption under any circumstances, regardless of commercial pressure, business benefit, or local practice. We accept that refusing to pay a bribe may result in loss of business; this is considered an acceptable and necessary consequence of maintaining our integrity and legal compliance.

4.3 Gifts and Hospitality

Reasonable and transparent gifts and hospitality can be a legitimate part of professional relationships. All gifts and hospitality must comply with the following rules:

Category	Rule
Permitted	Token gifts (max £50), reasonable business hospitality given openly, proportionate entertainment where business discussion is the primary purpose. All items above £25 must be logged in the Gifts & Hospitality Register.
Prohibited	Cash gifts in any amount; gifts/hospitality linked to any tender or contract award; anything intended to influence a decision; repeated gifts to the same individual that may create undue influence; anything offered to or received from public officials.

4.4 Procurement and Tendering

All procurement, tendering, and supply chain appointment activities must be conducted with complete integrity. Specific requirements include:

- All subcontractor appointments must follow a documented, competitive selection process
- No payment or advantage shall be offered or accepted to influence a tender outcome
- Personnel involved in procurement must declare conflicts of interest prior to assessment
- All framework, DPS, and contract award processes must be transparent and evidenced
- Facilitation payments to any individual or organization are strictly prohibited



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4.5 Due Diligence on Third Parties

Proportionate due diligence will be carried out on all significant third-party relationships prior to appointment, including:

- Assessment of reputation and business integrity
- Anti-bribery representations included in all subcontractor agreements
- Periodic reviews of ongoing third-party relationships
- Immediate termination where bribery or corruption is identified

4.6 Reporting Concerns — Speak Up Procedure

Any person who suspects bribery or corruption has occurred, is occurring, or is being planned must report this immediately to the Compliance Lead / Nominated Officer, or to the Director if the concern involves the Compliance Lead. Reports can also be made anonymously via the company's confidential reporting mechanism (details available from HR).

All reports will be treated seriously, investigated promptly, and handled with appropriate confidentiality. Individuals who raise genuine concerns in good faith will be protected from retaliation or victimization under our Whistleblowing Policy and the Public Interest Disclosure Act 1998. Failure to report a known or suspected breach may itself constitute a disciplinary offence.

4.7 Record Keeping

We will maintain accurate records to demonstrate compliance, including:

- Gifts and Hospitality Register (mandatory for all items above £25)
- Procurement of decision logs and evaluation documentation
- Third-party due diligence records
- Training attendance and completion records
- Incident and investigation logs



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All records will be retained for a minimum of six years.

5. COMPLIANCE / LEGAL STATEMENT

Key Legislation

Bribery Act 2010: Creates four criminal offences: bribing a person, being bribed, bribing a foreign public official, and failure of a commercial organization to prevent bribery.

Proceeds of Crime Act 2002: Governs proceeds of criminal conduct including corruption; imposes obligations to report money laundering suspicions.

Public Interest Disclosure Act 1998: Protects workers who make qualifying disclosures about wrongdoing, including bribery and corruption.

Procurement Act 2023: Governs public sector procurement conduct and ethical obligations applicable to public sector supply chains.

ISO 37001:2016: International Anti-Bribery Management System standard; our procedures are aligned to its principles.

Breach of this policy may constitute a criminal offence. Individuals found to have engaged in bribery or corruption will be subject to disciplinary action up to and including dismissal and may be reported to law enforcement authorities. The organization may face unlimited fines where it has failed to prevent bribery.

6. TRAINING AND AWARENESS

The following training program is in place:

- Induction training for all new employees and subcontractors covering this policy
- Annual refresher training for all staff with procurement or client-facing responsibilities
- Specific training for senior management and those in high-risk roles
- Awareness communications following any significant policy update or legislative change

Training completion is recorded and maintained by HR.



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7. REVIEW & MONITORING

Review Element	Detail
Review Frequency	Annually, or sooner if required by legislative change, there is a significant incident or material change in business activity.
Next Review Date	April 2026
Review Owner	Compliance Lead in consultation with the Director
Monitoring	Periodic audits of the Gifts & Hospitality Register, procurement records, and training completion data.
Board Reporting	Annual summary of policy compliance, incidents, and training rates presented to the Director.

8. POLICY SIGN-OFF

Policy Title	Anti-Bribery and Corruption Policy
Document Reference	ABC-POL-010
Version	1.0
Approved By	Amandeep Singh, Director
Approval Date	April 2025
Signature	<i>Amandeep Singh</i>
Next Review Date	April 2026