



Anti-Bribery, Fraud, and Corruption Policy & Procedure

Address:

5 Sovereign Court,
8 Graham St, Birmingham,
B1 3JR
Contact: 02039838555
Email: info@4SSG.co.uk
Web: <https://4ssg.co.uk/>

1. PURPOSE

4SSG UK Limited is committed to conducting its business with the highest level of integrity, transparency, and ethical standards. We operate a zero-tolerance approach towards bribery, fraud, and corruption. This policy sets out our commitment to compliance with the Bribery Act 2010 and our expectations from all employees, contractors, and associated persons in preventing unethical practices.

2. SCOPE

This policy applies to:

- a) All employees, directors, and officers of 4SSG UK Limited.
- b) Contractors, consultants, suppliers, and business partners acting on behalf of the company.
- c) Any third parties associated with 4SSG UK Limited in the UK and overseas.

3. BRIBERY & CORRUPTION

Bribery occurs when someone offers, promises, gives, requests, or accepts a financial or other advantage in exchange for improper performance of duties.

4SSG UK Limited prohibits:

- Offering or accepting bribes, kickbacks, or facilitation payments.
- Inducing or rewarding improper business conduct.
- Attempting to influence public officials unethically.
- Engaging in fraud, extortion, money laundering, or deception.

4. RESPONSIBILITIES

- Senior Management – Ensure compliance, training, and enforcement.
- Employees & Associated Persons – Report concerns, act ethically, and comply with policy requirements.
- HR & Compliance Team – Investigate reports and maintain records.

5. Gifts, Hospitality & Donations

4SSG UK Limited only permits reasonable and appropriate business gifts and hospitality when:

- a. It does not improperly influence business decisions.
- b. It is in line with industry norms (e.g., promotional gifts under £50).
- c. It is approved by management when exceeding £500.
- d. Charitable donations must be legal, ethical, and pre-approved.



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6. RISK MANAGEMENT & DUE DILIGENCE

- Regular risk assessments on bribery, fraud, and corruption exposure.
- Conducting due diligence on new business partners and contractors.
- Maintaining records of transactions to ensure transparency.
- Internal audits to detect and prevent non-compliance.

7. REPORTING & WHISTLEBLOWING

Employees are encouraged to report suspicions of bribery, fraud, or corruption confidentially:

- Internal Whistleblowing Mechanism – Reports can be made directly to management.
- Non-Retaliation Guarantee – Employees reporting in good faith are protected.
- Investigations – All allegations will be thoroughly reviewed, and corrective actions will be implemented.

8. BREACHES & CONSEQUENCES

- Any breach of this policy may result in:
- Disciplinary action, including dismissal.
- Criminal liability, leading to prosecution under the Bribery Act 2010.
- Contract termination for third-party partners violating this policy.

9. COMPLIANCE & TRAINING

- Annual anti-bribery training for all employees.
- Mandatory acknowledgment of this policy upon hiring.
- Regular policy reviews to ensure legal compliance and effectiveness.

10. ACKNOWLEDGMENT

All employees must read and acknowledge this policy by signing below:

Employee Name: _____

Employee Signature: _____

Date: _____



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11. POLICY REVIEW:

This Health and Safety Incidents Reporting Procedure will be regularly reviewed by the HR Manager and updated as necessary.

The Managing Director shall review this policy annually or follow significant changes.

A handwritten signature in black ink, appearing to read 'Nadeem Hussain'.

Nadeem Hussain

4SSG UK Limited

This policy is reviewed on 01 – 08 – 2024