


# ANTI-BRIBERY, CORRUPTION & COMPETITION POLICY

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Approved By:	Rob Kennedy
Signed:	

This policy statement is supplemented by other business policies, core values and mission statement which are available on our company website [www.kennedyredford.com](http://www.kennedyredford.com)

## GENERAL STATEMENT OF INTENT

It is the Policy of Kennedy Redford Limited to ensure that our business is conducted according to ethical, professional, and legal standards in a fair, honest, and open manner.

Kennedy Redford Limited has a zero-tolerance approach to all forms of bribery and corruption which include:

- The direct or indirect promise, offering or authorisation of anything of value.
- The offer or receipt of any kickback, loan, fee, reward, or other advantage.
- The giving of aid, donations or voting designed to exert improper influence.
- Payments for lavish or inappropriate entertainment or travel.
- Favours including offers of employment.
- Facilitation payments.
- Inflated commissions.
- Fake consultancy agreements.

Kennedy Redford Limited opposes all forms of bribery, corruption and anti competitive behaviour, large as well as small, whether initiated by corrupt officials or corrupt companies or individuals, and whether it takes place in the public or private sector, in the UK or abroad.

To adhere to the policy, we will:

- Ensure all Company personnel are provided with training on the Kennedy Redford Limited Company Policy on anti-bribery and corruption so they can recognise the signs and take steps to avoid it.
- Encourage employees, subcontractors, and business partners to report any suspicions of bribery and/or corruption through formal 'whistle blowing' channels or more informally through our Company 'open door' policy which enables any individuals to discuss any concerns they may have with senior management in a confidential environment.
- Understand how bribery may occur during the Kennedy Redford Limited operations and the impacts this could have, implementing appropriate control measures as necessary to prevent occurrence.
- Use appropriate disciplinary and other sanctions for violations of the policy and/or laws against bribery and corruption.
- Constantly monitor and regularly review this Anti-Bribery and Corruption Policy to ensure its continuing suitability.
- Undertake monitoring of employee expenses records to ascertain any anomalies which may fall into the scope of this Policy.
- Provide copies of this Anti-Bribery and Corruption Policy Statement to all employees.

Failure to comply with this policy may result in disciplinary action, including dismissal or appropriate sanctions, in addition to civil and criminal charges.

Additionally, we will ensure that we do not take part in any of the following anti-competitive behaviour:

- Joint selling or purchasing with competitors.
- Price fixing with retailers or suppliers.
- Keeping an exclusivity period in period of over 5 years.

Additionally, we will take all necessary steps to ensure that we are compliant with the requirements of the Competition and Markets Authority (CMA) and will implement best practice wherever possible.