



SINHA
SECURITY SERVICES LIMITED

SINHA SECURITY SERVICES LIMITED

PHONE: +44 7759 826816

EMAIL: info@sinhasecurityservices.co.uk

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Company Name: Sinha Security Services Limited

Effective Date: 1 September 2026

Review Date: 1 September 2027

1. Policy Statement

Sinha Security Services Limited is committed to conducting business in an honest, ethical, and professional manner. We operate a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships wherever we operate.

We are bound by the laws of the UK, including the **Bribery Act 2010**, which applies to our conduct both at home and abroad.

2. Objective and Scope

The purpose of this policy is to communicate our position on bribery and corruption to all employees, temporary workers, SIA-licensed guards, subcontractors, and suppliers. It provides information and guidance on how to recognize and deal with bribery and corruption issues.

This policy applies to all individuals working at all levels and grades within or for our company, including directors, senior managers, officers, employees (whether permanent, fixed-term, or temporary), consultants, contractors, and third-party labour providers.

3. What is Bribery?

A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage. It is illegal to:

- **Offer, promise, or give** a financial or other advantage to another person, intending to induce them to perform a function improperly.
- **Request, agree to receive, or accept** a financial or other advantage, intending that a function should be performed improperly.
- **Bribe a foreign public official** to win or retain business.

4. High-Risk Sectors & Operational Rules

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Within the private security industry, specific risks can arise during procurement, tendering, client entertainment, and contract extensions. To protect **Sinha Security Services Limited**, the following rules must be strictly observed:

A. Gifts and Hospitality

This policy does not prohibit normal and appropriate corporate hospitality or seasonal gifts (such as calendars or minor promotional items), provided that:

- It is not made with the intention of influencing a third party to obtain or retain business, or to win a specific contract or tender.
- It complies with local law.
- It is given in the name of **Sinha Security Services Limited**, not an individual.
- It does not include cash or cash equivalents (such as vouchers or gift cards).
- It is appropriate to the circumstances (e.g., small tokens given at Christmas).

B. Facilitation Payments and "Kickbacks"

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government or corporate action.

C. Charitable and Political Contributions

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a company director.

5. Supply Chain & Subcontractor Due Diligence

When utilizing temporary staffing agencies or subcontracting SIA security operatives, **Sinha Security Services Limited** expects the highest standards of integrity.

- All major subcontractors and labour suppliers must undergo a due diligence review before engagement.
- Contracts with suppliers will include explicit clauses requiring compliance with the Bribery Act 2010.

6. Record-Keeping



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We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

- All accounts, invoices, memoranda, and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, must be prepared and maintained with strict accuracy and completeness.
- No accounts must be kept "off-book" to facilitate or conceal improper payments.

7. How to Raise a Concern (Whistleblowing)

Employees and contractors are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are offered a bribe, are asked to make one, or suspect that any form of bribery or corruption is taking place, you must report it immediately.

- **Internal Contact:** Email info@sinhasecurityservices.co.uk, or call **+44 7759 826816**.
- **Protection:** We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers detrimental treatment as a result of refusing to take part in bribery or corruption.

8. Governance and Review

The Board of Directors of **Sinha Security Services Limited** has overall responsibility for ensuring this policy complies with our legal obligations and that all those under our control comply with it. This policy is reviewed annually.

Signed: _____

Date: _____

12/09/2026

Director, Sinha Security Services Limited

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