



Anti Bribery & Anti Corruption Policy

This Anti Bribery & Anti Corruption Policy is in place to set out the responsibilities of Jack Cotterill Tree Services Ltd (also known as JC Tree Services Ltd and the Company) and those who work for the Company, in regard to observing and upholding our zero tolerance position on bribery and corruption.

This policy also acts as a source of information and guidance for those working for Jack Cotterill Tree Services Ltd. It helps people to recognise and deal with bribery and corruption issues and to understand their individual responsibilities.

JC Tree Services Ltd is committed to conducting business in an ethical and honest manner and is committed to enforcing and implementing systems to ensure bribery and corruption are both prevented.

JC Tree Services Ltd has a zero tolerance for any bribery and corrupt activities. We are committed to acting fairly, professionally and with integrity and transparency in all business activities and relationships.

Jack Cotterill Tree Services Ltd acknowledges that bribery and corruption are punishable with a possible term of imprisonment and/or a fine.

If the Company is discovered to have taken part in corrupt activities we may be subject to an unlimited fine and potentially be excluded from any tendering opportunities for contracts/future business and also risk serious harm to our reputation. With this in mind we commit to preventing bribery and corruption in our business and take our responsibilities seriously.

Who is covered by our policy?

This policy applies to all Jack Cotterill Tree Services Ltd Employees, including Management, Directors or Contractors, trainees, casual workers, agency staff, volunteers, interns or sponsors or any person(s) associated with our subsidiaries or their employees, wherever they are located.

Any arrangements our company makes with a third party is subject to a clear contractual agreement and terms, which include specific provisions that require the third party to comply with minimum standards and procedures relating to anti bribery and corruption.



What is Bribery

Bribery refers to either offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage to persuade or influence an action or decision.

A bribe refers to any reward/object/item of value offered to another individual in order to gain commercial, contractual, regulatory or personal gain.

Bribery is not limited to the act of offering a bribe. If a person receives and accepts a bribe, they are also breaking the law.

What is Corruption

Corruption is a dishonest, unlawful or fraudulent behaviour or activity and can show itself in the form of giving or taking bribes to benefit the company or persons, using their power to influence decisions, commit fraud or embezzle monies.

Any corrupt behaviours or suspicious behaviours or activities should be reported to the Company's Senior Management Team for further investigations.

Employees must not engage in any form of bribery or corruption. They must not accept a bribe of any description. If uncertain whether something is a bribe or gift, they must seek further advice from the Company's Senior Management Team.

Gifts and Hospitality

JC Tree Services Ltd accepts normal and appropriate hospitality and goodwill gestures so long as it is made without the intention of influencing the decision for a contract, business or that a favour is not expected in return. The gift or hospitality must be given in the name of the company and not an individual name (where a company name is registered) and must not be monetary or of cash equivalent (ie gift voucher/certificate).

The gift or hospitality must be given appropriate to the circumstances (ie Christmas) or as a gift of gratitude for assisting with a large project.

This gift must also be given or received openly and not selectively and disclosed and logged on the Company gift register on the day received and its intention considered.

Facilitation payments



Jack Cotterill Tree Services Ltd will not accept and will not make any form of facilitation payment (to or from Government officials) of any nature as we recognised these as a form of bribery.

JC Tree Services Ltd recognises that, despite our strict policy on facilitation payments, Employees may face a situation where avoiding a facilitation payment may put their or their family's personal security at risk. Under these circumstances, the following steps must be taken;

- Keep any amounts to the minimum
- Ask for a receipt detailing the amount and reason for payment
- Create a record concerning the payment
- Report this incident to your Manager.

Donations to a Charitable Cause

Jack Cotterill Tree Services accepts and encourages the act of donating to charitable causes and agrees to disclose all charitable contributions it makes. All charitable donations made will be legal and ethical under local laws and practices and not offered or made without the approval of Senior Management.

Employees must be careful to ensure that any charitable contributions are not used to facilitate and conceal any acts of bribery. Employees must ensure that they read, understand and comply with this policy and as with any training or information given Employees are equally responsible for the prevention, detection and reporting of bribery and forms of corruption otherwise run the risk of breaching this anti bribery and anti corruption policy, thus jeopardising their role with the Company, and facing disciplinary action or dismissal for gross misconduct, as JC Tree Services Ltd has the right to terminate a contractual relationship with an Employee if this policy is breached.

How to raise a concern

If you feel there is an instance of bribery or corrupt activity occurring in relation to Jack Cotterill Tree Services Ltd you are encouraged to raise your concerns at the earliest stage possible. If uncertain about whether a certain action or behaviour is considered bribery or corruption you should speak to your Manager or a member of the Senior Management Team.



What to do if you are a victim of bribery or corruption

Advise your Manager or Senior Management as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future or if you have reason to believe that you are a victim of corrupt activity.

Protection

Jack Cotterill Tree Services Ltd understands that you may feel worried about potential repercussions should you refuse to accept or offer a bribe or you report a concern. The Company shall support anyone who raises concerns, in good faith under this policy even if any investigation finds that they were mistaken and it will ensure that nobody suffers any detrimental treatment as a result of refusing to accept or offer a bribe or corrupt services, or that they report a concern.

(Detrimental treatment refers to dismissal, disciplinary action, treats or unfavourable treatment in relation to the concern the individual raised).

If you feel you have been subjected to any unjust treatment as a result of a concern or refusal to accept or offer a bribe, you should inform your Manager immediately.

As part of the Induction process for all new Employees, this policy will be included as well as the Whistleblowing Policy and Employees will be asked annually that they accept and comply with this policy.

Jack Cotterill Tree Services Ltd's Anti Bribery & Anti Corruption Policy and zero tolerance attitude will be communicated clearly to all Contractors, Suppliers, business partners and any third parties, at the beginning of business relations and as appropriate thereafter.

JC Tree Services Ltd will keep detailed and accurate records with internal controls in place to act as evidence for all payments made ensuring a written record of the amount and reason are given and are for review by Management. It will be responsible for monitoring the effectiveness of this policy and will review and audit regularly, assessing the suitability, adequacy and effectiveness of the policy, asking Employees for suggestions on how to improve.

This policy does not form a part of the Employee's Contract of Employment and the Company may amend it at any time so to improve the effectiveness at combatting bribery and corruption.



This policy is available at Jack Cotterill Tree Services Ltd, Unit 8-9 Hanbury Wharf, Hanbury Road, Droitwich, WR9 7DU. All members of the team will receive training on their responsibilities and will be advised of any updates and revisions via email or during team meetings.

Signed: _____

Date: _____

[Handwritten signature]
1-11-23.

