

INNER CITY TRAFFIC MANAGEMENT LTD ANTI-BRIBERY POLICY HSP 05

Anti-Bribery, Corruption, Fraud, and Competition Law Compliance Policy

1.0 Purpose

This policy sets out the organisation's zero-tolerance approach to bribery, corruption, fraud, malpractice, and anti-competitive behaviour. It ensures compliance with relevant legislation, including the Bribery Act 2010 and Competition Law, and promotes ethical conduct across all business activities.

2.0 Scope

This policy applies to:

- All employees, managers, and directors
- Contractors, consultants, agency personnel, and temporary workers
- Any third party acting on behalf of the organisation
- All operational, commercial, procurement, and administrative activities

3.0 Definitions

- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence a decision.
- **Corruption:** Abuse of entrusted power for private gain.
- **Fraud:** Intentional deception for financial or personal benefit.
- **Malpractice:** Improper, unethical, or negligent behaviour that breaches policy or law.
- **Anti-competitive behaviour:** Conduct that restricts fair competition, such as collusion, price-fixing, bid-rigging, or market sharing.
- **Facilitation Payments:** Unofficial payments made to expedite routine actions — prohibited.
- **Designated Person:** The individual responsible for receiving and managing reports of suspected wrongdoing.

4.0 Policy Statement

The organisation prohibits:

- Bribery, corruption, fraud, and malpractice
- Facilitation payments, kickbacks, or unofficial fees
- Collusion, price-fixing, bid-rigging, or any anti-competitive behaviour
- Manipulation of procurement or tendering processes

- Concealment, falsification, or destruction of records
- Any conduct that undermines legal, ethical, or professional obligations

All employees and partners must act with integrity, transparency, and professionalism.

5.0 Fraud and Malpractice Control Process

5.1 Prevention Measures

- Segregation of duties in financial and procurement processes
- Mandatory approval levels for purchases and contracts
- Verification and due diligence checks on suppliers and third parties
- Regular internal audits and compliance checks
- Clear documentation and traceability of all transactions

5.2 Detection Measures

- Monitoring for financial irregularities
- Review of procurement patterns and supplier activity
- Reporting channels for suspicious behaviour
- Whistleblowing protections
- Audit trails maintained for all key processes

5.3 Response Measures

- Immediate reporting to the Designated Person
- Suspension of relevant transactions or activities
- Formal investigation
- Corrective and preventive actions
- Reporting to authorities where required

6.0 Compliance with the Bribery Act 2010

6.1 Review of Processes

All relevant business processes are reviewed annually against the requirements of the Bribery Act 2010 to ensure:

- Adequate procedures are in place
- Risks are identified and mitigated
- Controls remain effective and up to date

6.2 Training

- Mandatory anti-bribery training for all staff
- Enhanced training for employees in higher-risk roles
- Training records maintained by the organisation

7.0 Reporting and Investigation of Bribery, Corruption, and Anti-Competitive Behaviour

7.1 Reporting Channels

Suspensions may be reported to:

- The **Designated Person**
- A senior manager
- The confidential reporting channel (if applicable)

7.2 Investigation Process

- Reports are logged and acknowledged
- A preliminary assessment is conducted
- A formal investigation is initiated where warranted
- Evidence is collected and reviewed
- Findings are documented and corrective actions assigned
- Outcomes are communicated to relevant parties

Retaliation against whistleblowers is strictly prohibited.

8.0 Ensuring Compliance with Anti-Bribery and Corruption Laws

Compliance is ensured through:

- Regular audits of financial and operational processes
- Due diligence on suppliers, agents, and contractors
- Mandatory declarations of conflicts of interest
- Monitoring of high-risk activities
- Annual management review of compliance performance

9.0 Designated Person for Reporting Concerns

The organisation appoints a **Designated Person** responsible for:

- Receiving and managing reports of suspected bribery, corruption, fraud, or anti-competitive behaviour
- Ensuring investigations are conducted impartially
- Reporting findings to senior management

- Maintaining confidentiality and whistleblower protections

Contact details are published internally.

10.0 Compliance with Competition Law

10.1 Prohibited Conduct

Employees must not engage in:

- Price-fixing or market sharing
- Bid-rigging or collusion
- Sharing commercially sensitive information with competitors
- Agreements that restrict competition

10.2 Ensuring Compliance

- Competition Law training for relevant staff
- Legal review of commercial agreements
- Monitoring of procurement and tendering activities
- Clear separation of competitive and collaborative activities

10.3 Detection and Prevention

- Internal audits of commercial processes
- Review of communications with competitors
- Controls on information sharing
- Reporting channels for suspected anti-competitive behaviour

11.0 Recordkeeping

All transactions, reports, investigations, gifts, hospitality, and due diligence checks must be recorded accurately and retained in accordance with the organisation's document control requirements.

12.0 Non-Compliance

Breaches of this policy may result in:

- Disciplinary action up to dismissal
- Termination of contracts with third parties
- Reporting to authorities
- Corrective and preventive actions

13.0 Review and Continuous Improvement

This policy is reviewed annually or sooner if:

- Legislation changes
- Operational risks evolve
- Incidents or audits identify improvement opportunities



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