



**AS AQUASTAR**

**MECHANICAL, ELECTRICAL & PLUMBING**

*Devoted to Quality Works*



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## BRIBERY AND ANTI-CORRUPTION POLICY

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## 1. Purpose

The purpose of this Bribery and Anti-Corruption Policy is to demonstrate **AS AQUASTAR**'s commitment to conducting business ethically, honestly, and with integrity. This policy provides guidelines to prevent bribery, corruption, and other unethical practices within our operations and sets out responsibilities for compliance with relevant anti-bribery laws.

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## 2. Scope

This policy applies to all employees, contractors, consultants, partners, suppliers, and any other third parties acting on behalf of AS AQUASTAR. It covers all aspects of business conduct, including procurement, contracting, marketing, sales, and any other activities where bribery or corruption could be a concern.

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## 3. Policy Statement

AS AQUASTAR has a zero-tolerance approach to bribery and corruption. We are committed to:

- Complying with all applicable anti-bribery and anti-corruption laws, including the UK Bribery Act, the US Foreign Corrupt Practices Act (FCPA), and any other relevant regulations.
  - Maintaining the highest standards of integrity and ethical conduct in all our business dealings.
  - Prohibiting any form of bribery or corruption, whether direct or indirect, in any location where we operate.
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## 4. Definitions

### 4.1. Bribery

- Bribery involves offering, giving, receiving, or soliciting anything of value with the intent to influence the actions of an individual or organization in a position of authority.
- A bribe can take many forms, including cash payments, gifts, favours, hospitality, loans, or other benefits.

### 4.2. Corruption

- Corruption refers to the abuse of entrusted power or authority for private gain, including any dishonest or fraudulent behaviour that undermines ethical business practices.
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## 5. Prohibited Conduct

### 5.1. Offering Bribes

- Employees, contractors, and partners of AS AQUASTAR must not offer, promise, or give any financial or other advantage to any individual, company, or government official with

the intention of influencing them to obtain or retain business or gain an unfair advantage.

## **5.2. Receiving Bribes**

- Employees, contractors, and partners must not accept or solicit any form of payment, gift, hospitality, or other benefits that could be perceived as a bribe or an attempt to influence their professional judgment.

## **5.3. Facilitation Payments**

- Facilitation payments (small, unofficial payments to expedite routine government actions) are strictly prohibited, except where a person's safety or well-being is at risk. Any such incidents must be reported immediately to senior management.

## **5.4. Gifts and Hospitality**

- Gifts and hospitality must not be offered or accepted if they could influence, or be perceived to influence, a business decision. All gifts and hospitality must be reasonable, proportionate, and approved by management according to AS AQUASTAR's Gifts and Hospitality Guidelines.

## **5.5. Conflicts of Interest**

- Employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of AS AQUASTAR. Any potential conflicts must be disclosed to management.

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## **6. Responsibilities**

### **6.1. Senior Management**

- Lead by example by promoting a culture of integrity, transparency, and zero tolerance for bribery and corruption.
- Ensure the Bribery and Anti-Corruption Policy is implemented, communicated, and reviewed regularly to maintain its effectiveness.

### **6.2. Employees, Contractors, and Partners**

- Adhere to the Bribery and Anti-Corruption Policy and promptly report any suspicious behaviour or violations.
- Participate in anti-bribery training and awareness programs to stay informed about the risks of bribery and corruption.

### **6.3. Compliance Officer**

- A Compliance Officer will be appointed to oversee adherence to this policy, monitor risks, investigate concerns, and provide guidance on ethical business conduct.
- The Compliance Officer will maintain accurate records of all reported incidents, investigations, and outcomes.

## **7. Reporting and Whistleblowing**

### **7.1. Reporting Suspected Bribery**

- All employees, contractors, and third parties have a duty to report any actual or suspected bribery, corruption, or unethical behaviour. Reports can be made to a manager, senior management, or directly to the Compliance Officer.
- Reports can be made anonymously, and all information will be treated with strict confidentiality.

### **7.2. Whistleblower Protection**

- AS AQUASTAR will not tolerate retaliation or victimization against anyone who reports suspected bribery or corruption in good faith.
  - Whistleblowers will be protected, and any acts of retaliation will result in disciplinary action.
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## **8. Record-Keeping and Documentation**

### **8.1. Accurate Records**

- All financial transactions, expenses, and business activities must be recorded accurately and transparently, reflecting the true nature of the transaction.
- False or misleading records, including those that conceal or disguise improper payments, are strictly prohibited.

### **8.2. Due Diligence**

- Due diligence must be conducted on suppliers, contractors, agents, and partners to assess their risk of involvement in bribery or corruption.
- Contracts with third parties must include anti-bribery clauses to ensure compliance with this policy.

### **8.3. Gifts and Hospitality Register**

- A Gifts and Hospitality Register will be maintained to record any gifts, hospitality, or favours offered, given, or received.
  - Employees must report any gifts or hospitality to the Compliance Officer for inclusion in the register.
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## **9. Training and Awareness**

### **9.1. Employee Training**

- All employees must complete mandatory anti-bribery and anti-corruption training as part of their onboarding process and attend periodic refresher courses.
- Training will cover relevant laws, regulations, potential risks, and the consequences of non-compliance with this policy.

## 9.2. Awareness Campaigns

- Regular communication campaigns will be conducted to raise awareness about bribery and corruption risks, emphasize ethical conduct, and reinforce the zero-tolerance policy.
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## 10. Monitoring and Compliance

### 10.1. Monitoring

- The Compliance Officer will regularly review company practices, records, and procedures to ensure compliance with this policy.
- Internal audits may be conducted to identify potential risks, gaps in policy implementation, and opportunities for improvement.

### 10.2. Non-Compliance

- Breaches of this policy, including involvement in bribery or corruption, will be treated as a serious disciplinary matter and may result in termination of employment or contractual agreements.
  - AS AQUASTAR reserves the right to report any unlawful activity to the relevant authorities for further investigation.
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## 11. Review and Revision

### 11.1. Policy Review

- This Bribery and Anti-Corruption Policy will be reviewed annually or when significant changes occur in relevant laws, industry standards, or business practices.
- The policy will be updated to reflect best practices and new developments in anti-bribery measures.

### 11.2. Continuous Improvement

- Feedback from employees, clients, and stakeholders will be used to enhance the effectiveness of the policy.
  - AS AQUASTAR is committed to continuous improvement in anti-bribery and anti-corruption practices.
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## 12. Conclusion

AS AQUASTAR is committed to maintaining a business environment that is free from bribery and corruption. By enforcing this policy, we aim to protect our reputation, build trust with our clients and partners, and ensure compliance with all relevant laws and ethical standards.

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**Approved by:** *Liviu Ciobanu*  
**Date:** 13/08/2024  
**Review Cycle:** Annually