



Anti-Bribery and Corruption Policy

Preventing bribery, corruption, improper influence and unethical business conduct.

 <p>Zero tolerance</p> <p>No bribery, kickbacks, facilitation payments or improper rewards are acceptable.</p>	 <p>Fair tendering</p> <p>Bids, prices and supplier choices must be honest, documented and free from improper influence.</p>
 <p>Gifts control</p> <p>Gifts and hospitality must be modest, transparent and never used to win advantage.</p>	 <p>Report early</p> <p>Concerns must be raised promptly so risks can be contained and reviewed.</p>

Anti-bribery control route

A simple control route that is proportionate for Veraxus Ltd and useful for tender evidence.



Company	Veraxus Ltd
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Version	1.0
Approval date	11 May 2026
Approved by	Alex Stefan, Director
Next review	11 May 2027, or earlier if required

This policy is proportionate for a growing construction and refurbishment contractor. It gives Veraxus Ltd a clear ethical standard for tenders, supplier engagement, subcontractor appointment, project delivery and payment-related decisions.

1. Purpose and legal alignment

Veraxus Ltd is committed to conducting business honestly, transparently and with integrity. The company does not tolerate bribery, corruption, facilitation payments, kickbacks, secret commissions, improper inducements or dishonest conduct in any part of its operations or supply chain.

This policy is aligned with the Bribery Act 2010 and UK Government guidance on proportionate anti-bribery procedures. It applies a practical small-business approach based on clear expectations, due diligence, communication, reporting and review.

Proportionate position: Veraxus Ltd is not claiming to operate a large corporate compliance department. The company is adopting a written, director-led policy and practical controls that are suitable for its current size and tender ambitions.

2. Scope

This policy applies to directors, employees, workers, subcontractors, suppliers, consultants, agents and any third party working for or on behalf of Veraxus Ltd.

It applies to tendering, quotations, procurement, subcontractor engagement, supplier relationships, payment decisions, client communications, gifts and hospitality, project delivery and all business administration.

3. Core commitments

- Never offer, promise, give, request, agree to receive or accept a bribe or improper advantage.
- Never make facilitation payments, unofficial payments or cash inducements to speed up decisions or obtain services.
- Avoid gifts or hospitality that could influence, or appear to influence, business decisions.
- Keep fair and transparent procurement, pricing and subcontractor selection records where proportionate.
- Report bribery, fraud, improper influence, supplier pressure or suspicious payment requests promptly.

4. Higher-risk situations in construction

Risk area	Examples	Expected control
Tendering and quotations	Pressure to influence a client, consultant, buyer or decision-maker; requests for private advantage or unofficial contact.	Use official tender routes, record key communications and avoid improper approaches.
Subcontractor and supplier selection	Kickbacks, hidden rebates, family/friend preference, inflated pricing or undisclosed commission.	Select on capability, price, compliance, programme fit and documented business reasons.
Payments and variations	Requests for cash, unusual bank changes, false invoices, inflated claims or manipulation of variations.	Verify payment instructions, require written evidence and retain commercial records.
Gifts and hospitality	Lavish meals, personal favours, travel, entertainment or gifts offered during tender or award decisions.	Accept only modest, proportionate hospitality with no decision influence; decline or record concerns.
Third-party intermediaries	Consultants, introducers or agents promising guaranteed access or contract award.	Use clear written terms, due diligence and no success arrangements involving improper influence.

5. Gifts, hospitality and donations

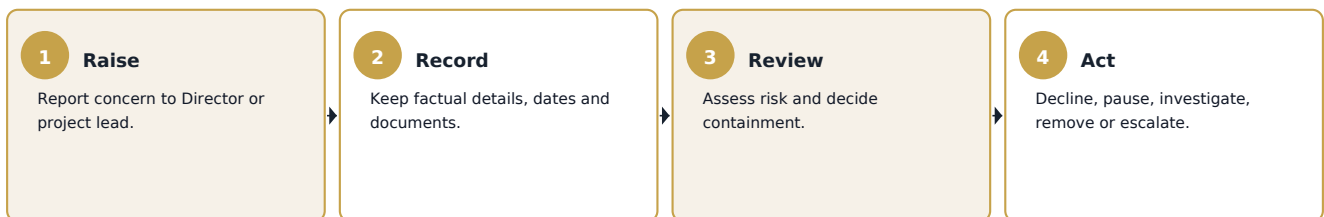
Gifts and hospitality may only be accepted or offered where they are modest, infrequent, transparent, lawful, business-related and not connected to an improper decision. Anything that could appear to influence a tender, quotation, variation, payment or appointment decision should be declined.

Cash, vouchers, personal loans, hidden rebates and personal favours are not acceptable. Political or charitable donations must never be used to obtain business advantage.

6. Due diligence and subcontractor controls

- Check that key suppliers and subcontractors appear legitimate, capable and appropriately insured where relevant.
- Use written scopes, agreed payment terms and transparent commercial arrangements.
- Avoid vague arrangements where a third party claims they can secure a contract through influence rather than capability.
- Escalate concerns about false invoices, hidden commission, bribery, corruption, fraud or suspicious payment routing.

7. Reporting and response



8. Tender wording

Veraxus Ltd has an Anti-Bribery and Corruption Policy in place. The company does not tolerate bribery, corruption, facilitation payments, kickbacks or improper influence. It applies proportionate director-led controls to tendering, procurement, supplier engagement, subcontractor appointment, gifts and hospitality, and reporting of concerns.

9. Monitoring and review

This policy will be reviewed annually or earlier if legal requirements, client expectations, tender requirements or operational risks materially change. Lessons from project experience, supplier engagement and reported concerns will be used to improve controls.

10. Reference alignment

Reference	Reason for relevance
Bribery Act 2010 and Ministry of Justice guidance	Relevant to commercial organisations and procedures to prevent bribery, including the six principles of proportionate procedures, top-level commitment, risk assessment, due diligence, communication and monitoring.
National Crime Agency anti-bribery business guidance	Supports practical awareness of bribery and corruption risks and anti-bribery controls.
Government Supplier Code of Conduct	Supports ethical behaviour, fair dealing, transparency and compliance expectations for public-sector suppliers.

Declaration and electronic approval

Electronic approval and signature

This document has been electronically approved and signed by the Director of Veraxus Ltd. The typed signature below is intended to authenticate and approve this document on behalf of the company.

Company	Veraxus Ltd
Document status	Approved
Name	Alex Stefan
Position	Director
Signature	Alex Stefan
Date	11 May 2026
Next review	11 May 2027, or earlier if required

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