



Head Office: Anubis Group (FM) Ltd, 5 Union Street, Carlisle, ML8 4AG

TEL: 0800 121 6576

ANTI-BRIBERY, CORRUPTION, FRAUD AND COMPETITION POLICY

1. POLICY STATEMENT

Anubis Group (FM) Ltd is committed to conducting its business lawfully, fairly and with integrity. The Company has zero tolerance for bribery, corruption, fraud, dishonesty, malpractice, collusion or anti-competitive behaviour by employees, directors, workers, agents, consultants, subcontractors, suppliers or any other person acting for or on behalf of the Company.

All business must be conducted in accordance with applicable UK legislation, including the Bribery Act 2010, Fraud Act 2006 and Competition Act 1998, together with any other relevant statutory or regulatory requirements.

The Managing Director has ultimate responsibility for ensuring that proportionate controls are maintained to prevent, identify, report and investigate suspected wrongdoing.

2. BRIBERY AND CORRUPTION

No employee or associated person may directly or indirectly offer, promise, give, request, receive or accept a financial or other advantage where the intention is to improperly influence another person, reward improper conduct or obtain an improper business advantage.

This prohibition applies equally to bribery involving private organisations and public officials.

Facilitation payments, kickbacks and similar improper payments are prohibited. The Company's existing definition and prohibition on bribery remains consistent with this principle.

3. FRAUD AND MALPRACTICE

Anubis Group (FM) Ltd will not tolerate fraud, dishonesty or deliberate malpractice.

This includes, but is not limited to:

- falsifying records, timesheets, expenses, invoices or other Company documents;
- theft or misuse of Company, client or third-party funds or assets;
- deliberately providing false or misleading information;
- manipulating procurement, tendering or payment processes;
- concealing financial or operational irregularities;
- misuse of confidential or commercially sensitive information; and

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- deliberately circumventing Company procedures or controls for personal or commercial gain.

Any suspected fraud or malpractice must be reported immediately.

4. DUE DILIGENCE

The Company undertakes proportionate due diligence on employees and relevant third parties according to the level of risk involved. For employees, this includes appropriate identity, employment, right-to-work, vetting, licensing and background checks relevant to their role.

Where suppliers, subcontractors, consultants, agents or other third parties may represent the Company or create a financial, regulatory or reputational exposure, the Company may consider matters including:

- ownership and business identity;
- competence and experience;
- regulatory and licensing status;
- insurance;
- financial standing where relevant;
- reputation and previous business conduct; and
- potential conflicts of interest.

Higher-risk relationships may be subject to additional management approval or review.

5. RISK ASSESSMENT

Risks relating to bribery, corruption, fraud and anti-competitive conduct are considered as part of the Company's wider risk management arrangements.

Particular consideration is given to activities involving:

- tendering and procurement;
 - subcontracting;
 - significant financial transactions;
 - the appointment of intermediaries or consultants;
 - gifts and hospitality;
 - conflicts of interest;
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- access to client or Company funds;
 - commercially sensitive information; and
 - business dealings where an individual may have the ability to improperly influence an outcome.

Controls are proportionate to the nature and level of risk identified.

6. FINANCIAL CONTROLS

Anubis Group (FM) Ltd maintains financial controls intended to reduce opportunities for fraud, bribery and unauthorised transactions. These include appropriate authorisation of expenditure, invoice verification, maintenance of financial records, management oversight and segregation of responsibilities where proportionate to the size and structure of the Company.

No employee may create, approve or process a payment that they know or reasonably suspect is false, misleading, improper or unsupported by a legitimate business purpose. Payments must be accurately recorded and must not be disguised or deliberately misdescribed.

7. GIFTS, HOSPITALITY AND EXPENSES

Reasonable and proportionate business hospitality may be permitted where it has a genuine business purpose and cannot reasonably be viewed as an attempt to improperly influence a decision. Existing Company controls require business entertainment to be reasonable, normally limited to a meal, with expenditure above £50 plus VAT per person requiring prior approval. Expense claims must identify those entertained and explain the business relationship.

Employees must report to the Managing Director any gift or hospitality with an individual value exceeding £100. Regardless of value, gifts or hospitality must not be offered or accepted where they could reasonably be considered an inducement, reward or attempt to improperly influence a business decision.

8. CONFLICTS OF INTEREST

Employees, directors and others acting on behalf of the Company must avoid situations in which personal interests could improperly influence, or appear to influence, business decisions.

Actual, potential or perceived conflicts of interest must be disclosed promptly to the Managing Director or appropriate senior manager. Examples may include:

- personal or financial interests in a supplier, competitor or client;

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- involvement of close relatives or associates in procurement or employment decisions;
 - outside employment that conflicts with Company interests; or
 - accepting benefits from an organisation seeking to influence a commercial decision.

Appropriate measures will be taken to manage the conflict, which may include removing the individual from the relevant decision-making process.

9. COMPETITION LAW AND ANTI-COMPETITIVE BEHAVIOUR

Anubis Group (FM) Ltd is committed to competing fairly and independently and complying with UK competition law. The Company will not enter into any formal or informal agreement, understanding or arrangement with a competitor that improperly restricts competition.

Prohibited conduct includes:

- price fixing or agreeing charge rates with competitors;
- bid rigging or agreeing who will win or withdraw from a tender;
- market or customer sharing;
- agreeing not to compete for particular contracts, sectors or geographical areas;
- exchanging confidential pricing, tendering, wage-rate or commercially sensitive information with competitors where doing so could restrict competition; and
- any other arrangement designed to manipulate or distort a competitive procurement process.

Commercial decisions concerning pricing, tenders, clients and markets must be made independently by Anubis Group (FM) Ltd. Employees must exercise particular care when communicating with competitors through industry meetings, networking events, trade associations or informal discussions. If a competitor attempts to discuss prices, tenders, market allocation or other commercially sensitive matters, the employee must disengage from the discussion and report the matter to management.

10. TRAINING AND COMMUNICATION

This policy is communicated to relevant employees and made available as part of the Company's management arrangements. Employees whose roles expose them to increased financial, procurement, commercial or third-party risk will receive appropriate guidance or training proportionate to their responsibilities. Employees are expected to understand that bribery, corruption, fraud and anti-competitive conduct may constitute both disciplinary offences and criminal offences.

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11. MONITORING AND AUDIT

Compliance with this policy is monitored through proportionate management controls, which may include:

- financial and expense reviews;
- management oversight;
- supplier and subcontractor reviews;
- internal audits;
- review of gifts and hospitality;
- investigation of complaints and irregularities;
- tender and procurement review; and
- consideration of issues raised through whistleblowing or employee reporting.

Where weaknesses or non-compliance are identified, corrective action will be taken and relevant procedures strengthened.

12. REPORTING CONCERNS

Employees are required to report any genuine concern or reasonable suspicion involving bribery, corruption, fraud, malpractice, conflicts of interest or anti-competitive behaviour. Concerns should normally be reported to the Managing Director or another member of senior management.

Employees who are offered or asked to participate in a bribe must refuse and report the matter immediately. This reflects the reporting requirement already contained within the existing policy. Concerns may also be raised under the Company's Whistleblowing Policy.

Reports will be handled sensitively and confidentially so far as reasonably and legally possible. No employee will be subjected to detrimental treatment for raising a genuine concern in good faith.

13. INVESTIGATION

All credible allegations or suspicions will be assessed promptly and, where appropriate, investigated by a person with sufficient independence from the matter concerned.

The investigation may include review of relevant documents, financial records, correspondence, electronic records and interviews with relevant individuals.



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Where appropriate, the Company may:

- suspend or restrict relevant authority while an investigation is undertaken;
- obtain professional legal, financial or other specialist advice;
- notify a client or other affected party;
- refer suspected criminal conduct to the police or appropriate regulatory authority; and
- commence disciplinary or contractual action.

Investigation records and outcomes will be appropriately documented.

14. BREACHES

A breach of this policy may constitute gross misconduct and may result in disciplinary action up to and including summary dismissal. The existing policy already provides for serious disciplinary consequences where breaches are established. Where the person concerned is a supplier, subcontractor, agent or other third party, the Company may suspend or terminate the relationship. Where there is evidence of criminal activity or serious regulatory wrongdoing, the matter may be referred to the relevant authorities.

15. RESPONSIBILITY AND REVIEW

The Managing Director, James Bullock, has ultimate responsibility for this policy and for ensuring that appropriate anti-bribery, fraud prevention and competition compliance arrangements are maintained. Directors and managers are responsible for applying the policy within their areas of responsibility, while every employee is responsible for complying with it and reporting suspected wrongdoing.

The policy will be reviewed annually, or sooner where there is a significant legislative, regulatory or organisational change, or where an incident indicates that existing controls require improvement.

Signed for and on behalf of: **ANUBIS GROUP (FM) LTD**

Signature: *James Bullock*

Name: James Bullock

Position: Managing Director

Date: 28th Day of August 2026

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EMPLOYEE ACKNOWLEDGEMENT

I confirm that I have been provided with access to the Anubis Group (FM) Ltd Anti-Bribery and Corruption Policy and understand my responsibility to raise genuine concerns regarding suspected wrongdoing in accordance with the procedures contained within it.

Employee Name: _____

Signature: _____

Date: _____

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