

Bribery Policy

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1. General Statement

1.1 CCM Policy Statement – Anti-bribery

CCM has a zero-tolerance policy towards any and all conduct directly or indirectly related to bribery. Our Company does not involve itself in any improper behaviour in this regard and all our employees are expected to adhere to the Company's Anti-bribery Policy at all times throughout their daily business activities.

CCM encourages open communication and it is imperative that CCM employees report any conduct that is believed to be inconsistent with our Anti-bribery Policy or that could be construed as unethical, unlawful or unsafe situations. Reporting suspected malpractice is often called 'whistle blowing' and CCM employees are requested to use this policy when it is believed that a suspected malpractice poses a risk to the interest of others or the Company.

Below is a list (not exhaustive) of some examples of malpractice that all CCM employees should be aware of and that include bribery and corruption:

- Fraud or other financial irregularities
- Bribery or corruption
- Misuse of sensitive information Undisclosed conflicts of interest Breaches of data protection standards
- Non-compliance with health and safety procedures

<p>Endorsed by;  Greg Doherty, Managing Director:</p>	<p>Dated: 01/06/2017</p>
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2. Scope

This Policy applies to the daily business activities of CCM Facilities Ltd throughout all areas of the business, our employees and has a further application to those of our suppliers and subcontracted partners. To this end we are committed to:

- setting out a clear Policy Statement with regard to Anti-bribery which will be reviewed at regular intervals
- creating awareness among all employees, suppliers and subcontracted partners of their responsibilities in adhering to the Company's Anti-bribery Policy at all times
- providing sufficient training to all employees to enable them to recognise the use of bribery either by themselves or by other people
- encouraging vigilance among our staff and to report any suspicions of bribery immediately to their line manager or supervisor
- investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution
- taking firm and vigorous action against any individual(s) involved in bribery

3. Responsibilities & Arrangements

3.1 Responsibilities of CCM Staff

The Company is committed to preventing, detecting and reporting any acts of bribery, fraud or other financial irregularities, corruption, the misuse of sensitive information, undisclosed conflicts of interest, breaches of data protection standards and non-compliance with health and safety procedures.

Our employees must adhere to the following principles at all times during the course of their work for and on behalf of CCM:

to ensure that they read, understand and comply with the Company's Anti-bribery Policy

- to raise any concerns immediately should a suspected conflict with the Anti-bribery Policy be noticed

Staff are able to raise a concern easily in order to help the Company detect, We all have a responsibility to help detect, prevent and report any instances of bribery and the sooner our employees report such an instance, then the matter can be resolved with greater efficiency.

4. Duties of Employees, Managers and Supervisors

Company employees should also raise their concerns under this policy if it is reasonably believed that someone is deliberately concealing information involving the examples above. This Policy will apply where malpractice is suspected concerning:

- CCM Facilities Ltd
- A CCM employee
- A CCM customer

With regard to bribery specifically, should a CCM employee experience a concern, they should raise the matter in the first instance with a Supervisor/Line Manager who may be able to resolve the matter informally and locally. Where there may be a conflict of interest, such that an employee cannot raise an issue with their line manager, the issue should be raised with a more senior manager. Alternatively you may contact the Head Office for further guidance as it is vitally important that CCM has the opportunity to resolve such instances within the Company with the utmost speed and efficiency and to ensure complete compliance with the Bribery Act 2010 as amended.

CCM therefore seeks to ensure that our Anti-bribery Policy is understood and applied throughout the Company through effective internal and external communication channels and including appropriate training for our staff with due monitoring and review of the Policy undertaken at regular intervals to incorporate any amendments or make improvements where necessary.