POLICY

Anti-Bribery Policy

Issued October 2026 · Next review October 2027 · Owner: John Neill, Sustainability Director

1. Purpose

1.1 Fibreuse Group Limited ("Fibreuse") takes a zero-tolerance approach to bribery, corruption and fraud. We conduct business honestly, fairly and with integrity wherever we operate.

1.2 This policy sets out how we comply with the **Bribery Act 2010**, which makes it an offence to offer, promise or give a bribe (section 1), to request or accept a bribe (section 2) or to bribe a foreign public official (section 6), and makes a commercial organisation liable for failing to prevent bribery by people associated with it (section 7) unless it has adequate procedures in place.

1.3 The **Economic Crime and Corporate Transparency Act 2023** introduced a "failure to prevent fraud" offence, in force since 1 September 2025. It currently applies only to large organisations, and Fibreuse is below that size; we nonetheless apply the same standards to prevent fraud committed for our benefit.

1.4 Individuals convicted of bribery face up to ten years' imprisonment and an unlimited fine. Organisations face unlimited fines, serious reputational damage and possible exclusion from public contracts under the **Procurement Act 2023**.

2. Scope

2.1 This policy applies to all directors, employees, workers, agency staff and contractors of Fibreuse, and to anyone acting on our behalf, including agents, partner sites, collectors and hauliers ("associated persons"), in the UK and abroad.

2.2 **Definitions.** A **bribe** is any financial or other advantage offered, given, requested or accepted to induce or reward improper performance. A **facilitation payment** is a small unofficial payment to speed up a routine official action; it is a bribe under UK law. **Fraud** includes false representation, false accounting and dishonestly withholding information to gain an advantage or cause a loss.

3. Our commitments

Bribery and facilitation payments

3.1 No one may offer, promise, give, request or accept a bribe or kickback, directly or through a third party. We do not make facilitation payments. If someone is threatened with harm unless they pay, they may pay to protect their safety, but must report it to the Sustainability Director immediately and record the amount and circumstances.

Gifts and hospitality

3.2 Modest gifts and hospitality are acceptable if they are reasonable and proportionate, given or received openly in the company's name, not cash or cash equivalents, and not intended to influence a decision. They must never be offered or accepted during a tender or contract negotiation with the other party.

3.3 Any gift or hospitality worth more than £100, and anything offered to or received from a public official, must be approved in advance by the Sustainability Director and recorded in the gifts and hospitality register.

Political and charitable contributions

3.4 Fibreuse does not make political donations. Charitable donations must be approved by the Sustainability Director, made openly and recorded, and must never be used to disguise a bribe.

Fraud and accurate information

3.5 We do not make false or misleading statements to customers, partners, regulators or public bodies. This includes weights, waste descriptions, waste documentation, destination and recycling claims, invoices and tender submissions. Records must never be altered or falsified.

Partner due diligence

3.6 Before engaging a partner, collector, haulier or agent, we carry out proportionate checks on its identity, registrations, permits and reputation. Contracts include anti-bribery and anti-fraud obligations, and we may end any relationship where these are breached.

Payments, records and conflicts of interest

3.7 Payments are made by bank transfer, against a valid invoice, to an account in the name of the contracting party. Cash payments to third parties are not permitted without the Sustainability Director's prior approval and a receipt. All transactions are recorded accurately and no accounts may be kept off the books.

3.8 Anyone with a personal interest that could conflict with their duties to Fibreuse must declare it to the Sustainability Director.

4. Responsibilities

4.1 **John Neill, Sustainability Director**, owns this policy, assesses bribery and fraud risks, approves gifts, hospitality and donations, and investigates concerns.

4.2 **Claire Warner, Head of Customer Service**, receives concerns at enquiries@fibreuse.com or on 0161 660 9501 and refers them to the Sustainability Director in confidence. Concerns can also be raised directly with John Neill at john.neill@fibreuse.com.

4.3 **Josie Williams, Accounts**, maintains accurate financial records, checks that payments match valid invoices and keeps the gifts and hospitality register.

4.4 **Everyone covered by this policy** must read and follow it, avoid any activity that could lead to a breach, and report any concern, offer or request for a bribe, or suspected fraud as soon as possible.

4.5 Anyone who raises a concern in good faith will be supported and will not suffer detrimental treatment, even if the concern turns out to be mistaken. Whistleblowers are also protected by the Public Interest Disclosure Act 1998.

4.6 A breach of this policy by an employee will lead to disciplinary action, which may include dismissal for gross misconduct. A breach by a partner may lead to termination of the contract. We will report criminal conduct to the appropriate authorities.

5. Monitoring and review

5.1 This policy is explained to employees at induction and refreshed regularly, and is communicated to partners at the start of the relationship.

5.2 The Sustainability Director monitors how well this policy works, reviews the gifts and hospitality register and any concerns raised, and reviews the policy annually, or sooner if the law or our risks change. This policy does not form part of any contract of employment and may be amended at any time.

Signed on behalf of Fibreuse Group Limited

Signature 

Name **John Neill**
Position **Sustainability Director**
Date **October 2026**

Reviewed annually, or sooner if legislation or our operations change. Next review: October 2027.

Appendix: Red flags

Report any of the following to the Sustainability Director promptly. The list is illustrative, not exhaustive.

1. A third party has a reputation for, or has been accused of, bribery or improper business practices.
2. A third party refuses to provide adequate information during due diligence.
3. A request for a commission, fee or payment in advance of signing a contract, or to 'facilitate' a service.
4. A request for payment in cash, to a third party, or to an account in a different name or country.
5. A refusal to put agreed terms in writing or to provide an invoice or receipt.
6. An invoice that is unusual, non-standard or high for the service provided.
7. A demand for lavish gifts or hospitality, or an unusually generous offer of them.
8. A request to employ or favour a friend or relative, or to make a political or charitable donation.
9. A request to use an unknown agent, intermediary or supplier.
10. Pressure to misdescribe waste, alter weights or documentation, or overstate recycling outcomes.