

Zero Tolerance Bribery and Corruption Policy

We are committed to maintaining the highest standards of business ethics and integrity. We firmly believe in conducting our business in a fair, transparent, and ethical manner. This Zero Tolerance Bribery and Corruption Policy reflects our dedication to comply with all applicable laws and regulations concerning bribery and corruption in the UK.

1. Prohibition of Bribery and Corruption

Hydro Group strictly prohibits any form of bribery, corruption, or improper inducement in any aspect of our business operations. This policy applies to all employees, directors, officers, contractors, consultants, and anyone else acting on behalf of our organisation.

2. Compliance with Laws and Regulations

We are committed to complying with all anti-bribery and anti-corruption laws in the UK, including the Bribery Act 2010. We will actively promote a culture of compliance and ethics throughout the organisation.

3. Definition of Bribery and Corruption

For the purposes of this policy, bribery and corruption are defined as follows:

a. Bribery: Offering, promising, giving, requesting, or accepting any financial or non-financial advantage to improperly influence an individual in the performance of their duties, or to gain or retain business or any other advantage.

b. Corruption: Any abuse of entrusted power or position for personal gain or to benefit others, leading to unfair or improper advantages.

4. Gifts, Entertainment, and Hospitality

While the exchange of reasonable and appropriate gifts, entertainment, or hospitality is an accepted business practice, it must never be used as a means to obtain or retain business improperly. All gifts, entertainment, or hospitality given or received must be within reasonable limits and comply with relevant policies and guidelines.

5. Facilitation Payments

Facilitation payments, regardless of their size, are strictly prohibited. Employees must not offer, solicit, or accept facilitation payments, which are payments made to secure or expedite routine government actions.

6. Third-Party Due Diligence

We undertake a thorough risk-based approach to assess and monitor the integrity of third parties with whom we conduct business. Before entering into relationships with third parties, we conduct due diligence to ensure they uphold similar anti-bribery and corruption standards.

7. Reporting and Whistleblowing

We encourage all employees and stakeholders to report any concerns or suspicions of bribery or corruption promptly. Reports can be made to HR.

8. Investigations and Disciplinary Actions

Upon receiving reports of potential bribery or corruption, we will conduct prompt and impartial investigations. If any violation of this policy is substantiated, appropriate disciplinary actions, up to and including termination, will be taken against the responsible parties.

Hydro Group is committed to maintaining a business environment free from bribery and corruption. By adhering to this Zero Tolerance Bribery and Corruption Policy and promoting

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ethical behaviour, we aim to build trust with our stakeholders and contribute to a fair and transparent business ecosystem in the UK.

This policy will be reviewed periodically to ensure its effectiveness and relevance in preventing bribery and corruption.

Signed: 

Date: 31/08/23

Marc Gordon – Managing Director

Revision	Date	Description	Owner	Approver
00	31 Aug 2023	First Issue	HR Partner	Managing Director