

Ethics & Anti-Corruption Policy Pack



Together

We are **Clemark Group**,

Registered in England & Wales under **Associate Enterprises Limited** and including all wholly owned subsidiaries. We also trade as Assent, Lorators, Clemark.

Our integrated management system covers the provision of consultancy, auditing, training, creative, technology and other professional services delivered in-person and remotely to ensuring the quality of products/services and the security of all information.

Table of Contents

1. Code of Ethics & Conduct.....	3
1.1 Purpose.....	3
1.2 Relevant UK Frameworks.....	3
1.3 Core Principles.....	3
1.4 Expected Behaviour.....	3
2. Anti-Bribery & Corruption Policy.....	4
2.1 Purpose.....	4
2.2 Relevant UK Frameworks.....	4
Core Principles.....	4
2.3 Accepting Gifts, Hospitality and Donations.....	4
2.4 Conducting Business.....	4
2.5 Managing Conflicts of Interest.....	5
2.6 Whistle-Blowing.....	5
3. Whistleblowing Policy.....	6
3.1 Purpose.....	6
3.2 Scope and Aims.....	6
3.3 Reportable Concerns.....	6
3.4 Protection for Whistleblowers.....	7
3.5 Raising a Concern.....	7
3.6 Handling Concerns.....	7
3.7 Escalation.....	7
3.8 Responsibility and Review.....	7
4. Anti-Money Laundering (AML) & Financial Crime.....	8
4.1 Purpose.....	8
4.2 Policy Statement.....	8
4.3 Key Requirements.....	8
4.4 Responsibilities.....	8
4.5 Training.....	9
4.6 Breaches.....	9
Relevant Additional Information.....	9

1. Code of Ethics & Conduct

1.1 Purpose

To establish clear expectations for professional and ethical behaviour across our organisation in line with UK legal and regulatory standards.

1.2 Relevant UK Frameworks

The policies in this document align with: -

- UK Bribery Act 2010
- Companies Act 2006,
- Fraud Act 2006
- Proceeds of Crime Act 2002 (POCA)
- Money Laundering Regulations 2017 (as amended)
- UK Corporate Governance Code (where applicable)
- Public Interest Disclosure Act 1998 (PIDA)

1.3 Core Principles

- Integrity: Act honestly and transparently at all times
- Objectivity: Avoid bias, conflicts of interest, or undue influence
- Confidentiality: Protect client and company information
- Professional Competence: Maintain high standards of work
- Accountability: Take responsibility for decisions and actions

1.4 Expected Behaviour

Employees must:

- Act in the best interest of clients and the organisation
 - Avoid misleading information or misrepresentation
 - Use personal social media responsibly and be mindful that what you post can affect how the company is perceived
 - Maintain independence in audit and consultancy work
 - Report unethical behaviour immediately.
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2. Anti-Bribery & Corruption Policy

2.1 Purpose

We strive to conduct our business with transparency and fairness, and in compliance with the law.

The following anti-bribery policy has been agreed by the board and applies to all employees, sub-contractors and other interested parties.

2.2 Relevant UK Frameworks

The UK Bribery Act 2010 makes it is illegal to offer, promise, give, request, agree, receive or accept bribes.

In general, any of the above that may cause a person to improperly perform a function or activity resulting in an advantage to the other party would not be acceptable.

Core Principles

2.3 Accepting Gifts, Hospitality and Donations.

Genuine hospitality it not forbidden but for the purposes of transparency the following rules apply:

- Hospitality within reason does not require board approval
 - for example a client, supplier, or other interested party buying lunch or providing small gifts such as branded merch.
- Hospitality beyond a reasonable daily expense must be declared to top management prior to acceptance
 - for example, tickets to an event, gifts over £30 in value.
- Any hospitality that may be intended to encourage additional benefits should be declared to top management immediately and no further interaction conducted until top management has reached a decision.
 - For example, any gifts given with the intent of extensive and ongoing brand promotion, or with the expectation of further advantages e.g. free consultancy time or inferring a preferential business connection.

The company accepts that maintaining good business relationships is essential to the success of the company.

2.4 Conducting Business

In conducting the activities of the business, all parties should be aware of this policy and their obligations under the Bribery Act 2010.

The integrity of the organisation is of paramount importance and any loss of integrity could cause serious reputational damage, in addition to financial and criminal sanctions under the Act.

All business transactions and communications must be clearly defined between the parties involved, and there should always be an audit trail to support the decisions made, to ensure that they have been made with integrity.

2.5 Managing Conflicts of Interest

Occasionally a conflict of interest may occur, for example (but not limited to):

- The supplier or customer contact point is a relation or close friend to you.
- You have a direct or indirect financial interest in the supplier or customer organisation.
- You have a contractual relationship with the supplier or customer outside of work – for example you have taken services from them in your personal life.
- The information exchanged during the business transaction relates to you, your family or close friends.

In this event you should immediately report the conflict to your line manager, and if practicable, continue no further with the transaction or interaction.

Several options will then be available including:

- Handing the transaction or business to another colleague who is not compromised.
- Continuing the transaction or business under increased supervision.

2.6 Whistle-Blowing

There is no example where bribery is considered acceptable business practice and all staff have a responsibility to report suspected occurrences to an appropriate independent source such as a line manager or director.

Reports are investigated in confidence.

See our Whistleblowing Policy.

3. Whistleblowing Policy

3.1 Purpose

Whistleblowing is the reporting of suspected wrongdoing, misconduct, or breaches of policy or law.

This policy explains:

- What concerns can be raised
- How to report a concern
- How individuals will be protected
- How concerns will be handled

3.2 Scope and Aims

Aims

This policy enables individuals to raise concerns safely and without fear of retaliation. It aims to:

- Encourage early reporting of concerns
- Provide clear reporting routes
- Ensure concerns are taken seriously
- Protect those who raise concerns in good faith

Scope

This policy applies to:

- Employees
- Contractors
- External stakeholders

It does not replace grievance or complaints procedures.

3.3 Reportable Concerns

Concerns should be raised about any suspected wrongdoing, including:

- Breaches of law or policy
- Discrimination or harassment
- Health and safety risks
- Fraud, corruption, or misuse of resources
- Unethical or improper conduct

3.4 Protection for Whistleblowers

- Individuals raising concerns in good faith will be protected from retaliation.
- Victimisation or harassment of whistleblowers will not be tolerated.
- Support will be provided where appropriate.

Confidentiality will be maintained where possible. Anonymous reports will be accepted, but the effectiveness of the investigation may be limited.

False or malicious allegations may result in disciplinary action.

3.5 Raising a Concern

Concerns can be raised with a director, “head of”, or the Tell Jane Hotline (0800 689 0802 or www.telljane.co.uk/free-reporting-hotline)

Concerns may be raised verbally or in writing and should include:

- Details of the issue
- Relevant background information

Individuals may be accompanied by a colleague or representative in meetings.

3.6 Handling Concerns

- Concerns will be acknowledged and assessed promptly.
- An appropriate investigation will be carried out where necessary.
- Confidentiality will be maintained as far as possible.
- Individuals will be informed of progress and outcomes where appropriate.

3.7 Escalation

If concerns are not resolved internally, they may be raised with appropriate external bodies such as regulators, auditors, or law enforcement, in line with legal protections.

3.8 Responsibility and Review

Top management is responsible for overseeing this policy and maintaining records of concerns raised.

This policy will be reviewed periodically to ensure effectiveness and compliance.

4. Anti-Money Laundering (AML) & Financial Crime

4.1 Purpose

To prevent the organisation from being used for money laundering or terrorist financing and to ensure compliance with UK legal and regulatory requirements.

4.2 Policy Statement

We have a zero-tolerance approach to money laundering and financial crime. All employees are required to act with vigilance and report any suspicious activity.

4.3 Key Requirements

Client Due Diligence (CDD)

- Verify the identity of clients before engagement
- Apply enhanced checks for high-risk clients
- Verify financial and contact information prior to conducting services.

Ongoing Monitoring

- Monitor client relationships and transactions for unusual activity
- Keep client information up to date

Record Keeping

- Maintain records of CDD and transactions for at least 7 years

Reporting Suspicious Activity

- Report concerns immediately to a director.
- Do not let the client or third parties know.

4.4 Responsibilities

Employees

- Remain alert to suspicious behaviour
- Complete any training assigned to you
- Report concerns promptly

Directors

- Remain alert to suspicious behaviour
- Fully investigate any reports made

- Contact authorities where necessary.

4.5 Training

Appropriate training may be assigned to employees.

4.6 Breaches

Failure to comply with this policy may result in disciplinary action and potential legal consequences.

Relevant Additional Information

- [Supplier Policy](#)
- [Supplier Code of Conduct](#)
- [Disciplinary Procedure](#)
- [Staff Handbook](#)
- [Internal People Intro Handbook](#)