

Business: Different Touch Ltd

Approved By: Director, Shelton  
Graham

Version: 1.2

Effective Date: 24 March 2026

Review Date: 24 March 2027



# Anti-Bribery and Corruption Policy

## 1. Policy Statement

Different Touch Ltd is committed to conducting its business honestly, fairly, and with integrity. We take a zero-tolerance approach to bribery and corruption and will not offer, give, request, or accept any bribe, kickback, improper payment, favour, or other incentive intended to influence a business decision.

As a professional business, we understand that trust, reputation, and professional conduct are essential. We are committed to making decisions based on genuine business reasons, including quality, price, service, suitability, and value for money.

## 2. Purpose

This policy sets out Different Touch Ltd's approach to preventing bribery and corruption and explains the standards expected from anyone working for or on behalf of the business. It also supports compliance with the Bribery Act 2010 and helps protect the business, its clients, and its reputation.

## 3. Scope

This policy applies to all persons working for or on behalf of Different Touch Ltd, including the Director, employees, subcontractors, labour-only operatives, consultants, suppliers, agents, and anyone representing the business.

It applies to all business activities, including procurement, quotations, subcontractor appointments, material orders, inspections, approvals, invoicing, and payments.

## 4. What Bribery and Corruption Means

Bribery means offering, promising, giving, requesting, or accepting money or any other advantage in order to improperly influence a decision or action.

Corruption means acting dishonestly or abusing a position for personal gain or unfair advantage.

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Examples include:

- offering money, gifts, or favours to win work or secure favourable treatment.
- accepting personal rewards from a supplier or subcontractor.
- approving inflated costs or false invoices in return for a benefit.
- giving work to someone because of personal gain rather than merit.
- making unofficial payments to speed up decisions or services.

## 5. Our Method for Tackling Bribery and Corruption

As a business, Different Touch Ltd tackles bribery and corruption through practical day-to-day controls and close oversight. Our method includes:

- Clear standards for everyone working with us is expected to act honestly and professionally at all times.
- Director oversight to reduce the risk of improper influence.
- Fair procurement, pricing, quotations, appointments, orders, and payments must be based on genuine business reasons and not personal benefit
- Accurate record keeping where we will keep clear records of quotations, invoices, approvals, and payments.
- Checking who we work with to ensure suppliers and subcontractors are suitable and act professionally.
- Reporting any concerns about bribery, suspicious payments, gifts, or conflicts of interest must be raised immediately.
- Review procedures from to make sure they remain suitable for the size of the business.

## 6. Prohibited Conduct

Different Touch Ltd strictly prohibits:

1. bribery in any form
2. facilitation payments
3. kickbacks or secret commissions
4. false, misleading, or inflated invoices
5. improper gifts, hospitality, or rewards linked to business decisions
6. favouritism in appointing suppliers or subcontractors for personal reasons
7. any attempt to bypass proper approval or payment processes

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## 7. Gifts and Hospitality

Reasonable and modest hospitality may be acceptable where it is part of normal business practice. However, gifts or hospitality must never be offered or accepted where they could influence, or appear to influence, a decision.

Cash gifts or cash equivalents must never be offered or accepted. Any gift or hospitality that could be seen as excessive, inappropriate, or linked to a quotation, approval, payment, or contract award must be refused and reported to the Director.

## 8. Conflicts of Interest

A conflict of interest arises where personal interests, family connections, or outside relationships could affect, or appear to affect, business decisions.

Examples include appointing a friend, relative, or connected business without proper justification, accepting personal benefits from a supplier, or influencing a decision where there is a personal interest. Any actual or potential conflict must be declared to the Director immediately.

## 9. Responsibilities

The Director is responsible for setting the standard for honest and ethical behaviour, overseeing compliance with this policy, reviewing concerns, and taking action where needed.

Anyone working for or on behalf of Different Touch Ltd is responsible for acting honestly, following this policy, refusing to take part in bribery or corruption, and reporting any concerns straight away.

## 10. Reporting Concerns

Any person who knows of, suspects, or is asked to take part in bribery or corruption must report it to the Director immediately.

This includes concerns about:

- Unofficial payments or cash requests.
- Suspicious invoices or inflated costs.
- Gifts or favours linked to decisions.
- Personal interests affecting procurement or approvals.

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- Attempts to avoid normal paperwork or approval routes.

Different Touch Ltd will treat all genuine concerns seriously and no one will be treated unfairly for raising a concern in good faith.

## 11. Record Keeping

Different Touch Ltd will keep accurate and complete records of quotations, invoices, purchases, subcontractor appointments, approvals, payments, and any declared conflicts of interest or reported concerns.

Good record keeping is one of the main ways we prevent and identify bribery and corruption. False or misleading records are not acceptable.

## 12. Breaches of this Policy

Any breach of this policy may result in disciplinary action, termination of a contract or working arrangement, and where appropriate, referral to the police, client, or relevant authority.

## 13. Monitoring and Review

This policy will be reviewed annually, or sooner if there is a change in legislation, business activity, or identified risk. Different Touch Ltd will keep the policy practical and proportionate to the size of the business.

## 14. Version Control

Version	Date	Approved By	Summary of Changes
1.2	24 March 2026	Director	Initial issue

**Shelton Graham**

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Director

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