



# Anti-Bribery and Corruption (ABC) Policy

## *For Stanford & Green Limited*

### 1. Purpose

This Policy sets out Stanford & Green Limited's zero-tolerance approach to bribery and corruption.

It aims to protect the integrity of our enforcement activities and ensure compliance with applicable laws, including the [e.g., UK Bribery Act 2010].

We are committed to acting professionally, fairly, and with honesty and transparency in all our business dealings.

### 2. Scope

This Policy applies to:

- All employees, directors, enforcement agents, contractors, and any other individuals representing Stanford & Green Limited.
- All interactions with clients, debtors, court officials, suppliers, and third parties.

### 3. Policy Statement

Stanford & Green Limited prohibits:

- Offering, giving, soliciting, or accepting bribes of any kind.
- Making facilitation payments ("grease payments") to speed up routine services.
- Offering or accepting gifts or hospitality intended to improperly influence decisions.
- Engaging in any activity that could be perceived as corrupt or unethical.

Bribery and corruption are criminal offenses. Breaches of this Policy may result in disciplinary action, up to and including dismissal, and may also lead to prosecution.

### 4. Definitions

- **Bribery:** Offering, promising, giving, accepting, or soliciting anything of value to improperly influence a decision or action.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payment:** Small, unofficial payments to speed up a service to which the payer is legally entitled.

## 5. Risk Areas for Bailiff Work

Key risk areas for enforcement agents include:

- Accepting "gifts" from debtors to influence the handling of enforcement actions.
- Offering incentives to court staff, police, or local authorities.
- Supplier dealings, including valuers or auctioneers.
- Awarding contracts based on favours rather than merit.

## 6. Gifts and Hospitality

- Low-value gifts (e.g., under £50) may be accepted if they are:
  - Given openly,
  - Not intended to influence a decision,
  - Properly declared to management.
- Cash or cash equivalents (e.g., vouchers) must never be accepted.
- Hospitality (e.g., meals, events) must be proportionate and declared to management for approval.

When in doubt, declare it.

## 7. Reporting Obligations

If you are:

- Offered a bribe,
- Asked to make an improper payment,
- Offered suspicious gifts or favours,
- Aware of others violating this policy,

You must immediately report it to your Manager or the Anti-Bribery Officer (ABO) Martin Stanford.

Reports will be handled confidentially and without retaliation against those reporting in good faith.

## **8. Training and Communication**

- All staff and agents will receive annual Anti-Bribery and Corruption training.
- New employees and contractors must complete induction training within 30 days of joining.

## **9. Monitoring and Review**

- The Anti-Bribery Officer (ABO) is responsible for monitoring compliance.
- This Policy will be reviewed every 12 months or when significant regulatory changes occur.

Martin Stanford

Director

8 January 2026

### Key Takeaways for Enforcement Agents

- Do not accept money or favours from debtors.
- Do not offer payments to officials for favourable treatment.
- Always report any suspicious behaviour immediately.
- Be transparent about gifts and hospitality.