



LWL Platinum Cleaning Services Ltd

Anti-Bribery & Corruption Policy

Clear Definitions

At LWL Platinum Cleaning Services Ltd, bribery is defined as offering, promising, giving, accepting, or soliciting an advantage as an inducement for action which is illegal, unethical, or a breach of trust. Corruption is the abuse of entrusted power for private gain. Examples of prohibited conduct include:

- Offering or receiving cash payments to secure business advantages
- Providing lavish gifts or hospitality to influence decisions
- Making donations to charities linked to clients or officials to gain favor

Management Commitment

Our top management is fully committed to upholding the highest ethical standards and strictly enforcing this policy. They will lead by example, ensuring that all employees understand the importance of preventing bribery and corruption and are equipped to follow the policy diligently.

The Purpose of the Policy

The objectives of this anti-bribery and corruption policy are to:

- Ensure compliance with relevant laws and regulations
- Uphold ethical standards in all our business dealings
- Mitigate risks associated with bribery and corruption

Risk Assessment

We will routinely assess vulnerabilities within our operations, identify high-risk areas, and implement appropriate controls to mitigate these risks. This includes regular audits, due diligence on third parties, and continuous monitoring of business activities.



Gift, Hospitality, or Donation Guidelines

LWL Platinum Cleaning Services Ltd has strict guidelines on the giving and receiving of gifts, hospitality, or donations:

- Employees are prohibited from offering, giving, or receiving gifts or hospitality that could influence business decisions
- All gifts and hospitality must be reported and approved by management
- Donations must be transparent, properly recorded, and not influence business outcomes

Strategies to Reduce and Manage Bribery and Corruption Risks

Our proactive measures to manage bribery and corruption risks include:

- Conducting thorough due diligence on all business partners and third parties
- Fostering a culture of integrity and zero tolerance towards bribery
- Implementing robust internal controls and regular audits
- Encouraging employees to report concerns without fear of retaliation

Procedures for Whistleblowing

We have established confidential channels for employees and stakeholders to report suspected instances of bribery or corruption. Reports can be made anonymously, and we guarantee protection against retaliation for whistleblowers.

Information on Reporting Bribes

Employees are instructed to report any attempts or instances of bribery or corruption immediately to their manager or the compliance officer. Reports can also be made externally to relevant authorities. Clear procedures and contact information are provided to all employees.



Training

We offer regular training programs to ensure employees are well-informed about our anti-bribery and corruption policies, procedures, and legal requirements. This training is mandatory for all employees and is reviewed and updated periodically.

Reviewing and Updating the Policy

We continually monitor compliance with our anti-bribery and corruption policy. The policy is reviewed regularly and updated to reflect changing circumstances, emerging risks, and new legal requirements, ensuring it remains effective and relevant.

By adhering to this policy, LWL Platinum Cleaning Services Ltd aims to maintain the highest standards of integrity and transparency in all our business dealings.

A handwritten signature in black ink, appearing to read 'L Spence'.

Lisa Spence

Managing Director

1st April 2025