





Anti-Bribery Risk Assessment

RA031-CEN

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1	23/06/2025	Steve Usher	New draft

Note Under no circumstances is this document to be modified in any way without the QHSE Managers consent. Uncontrolled when Printed or Downloaded

1 Purpose

- 1.1 The purpose of this Anti-Bribery Risk Assessment is to identify, assess, and manage the risks associated with bribery and corrupt practices across Hatton Traffic Management Ltd's operations. This document supports our commitment to upholding the highest standards of integrity, transparency, and ethical conduct in accordance with the Bribery Act 2010 and other applicable legislation.
- 1.2 Bribery poses significant legal, financial, and reputational risks to the business. By proactively identifying potential bribery scenarios and applying appropriate control measures, we aim to ensure all personnel act responsibly and in accordance with our core values and anti-corruption principles.

Note Any deviation from this Risk Assessment or any linked documents mentioned below, must be agreed with the QHSE Manager.

2 Scope

- 2.1 This risk assessment applies to all Hatton Traffic Management Ltd employees, subcontractors, suppliers, agency workers, and any third parties acting on our behalf. It covers all operational activities, including but not limited to:
 - Temporary Traffic management & Civils Work
 - Procurement & Supply Chain Interactions
 - Subcontractor & Consultant Engagement
 - Tendering & Commercial Activities
 - Client & Authority Liaison
 - Financial Transactions & Site Level Approvals
- 2.2 This assessment supports the organisation's compliance with ISO 9001, ISO 14001, and ISO 45001 requirements by addressing bribery as a significant business risk. It also contributes to RISQS obligations relating to ethical conduct, leadership commitment, and legal compliance

3 Objectives

- 3.1 To identify bribery-related risks relevant to our operations.
- 3.2 To assess the likelihood and impact of each risk
- 3.3 To implement appropriate control measures that reduce risk to an acceptable level
- 3.4 To raise awareness among employees and stakeholders of bribery risks and prevention methods
- 3.5 To meet legal and contractual obligations under the Bribery Act 2010

4 Responsibilities

- 4.1 Managing Director
 - Overall accountability for anti-bribery risk management
 - Ensures adequate resources and oversight
- 4.2 QHSE Manager
 - Oversees implementation and review of anti-bribery controls

- Conducts audits and updates risk register

4.3 Commercial Manager

- Ensures due diligence during tendering and procurement
- Prevents supplier inducements

4.4 General Manager/Depot Managers

- Communicate anti-bribery expectations to teams
- Report any concerns or suspicious activity

4.5 HR Officer

- Maintains whistleblowing procedures
- Manages disciplinary processes

4.6 All Employees

- Must understand and comply with the Anti-Bribery Policy
- Must report any observed or suspected bribery incidents

5 Legal & Policy Framework

5.1 This risk assessment supports the application of:

- The Bribery Act 2010, including sections on offering, receiving, or facilitating bribes
- Hatton Traffic Management Ltd's PY016-CEN Bribery, Tax, Evasion, Corruption, Fraud, Malpractice & Whistle-Blowing Policy.

6 Reviewing & Monitoring

6.1 This assessment will be:

- Reviewed annually or in response to significant changes in the organisation, contracts, or legislation
- Updated following any bribery incident, investigation, or whistleblower report
- Monitored through internal audits and periodic QHSE management reviews

7 Risk Assessments

7.1 To assess the severity of bribery-related risks, Hatton Traffic Management Ltd uses a Risk Matrix based on:

- Likelihood (L) – How likely is the risk to occur?
- Severity (S) – What would be the impact if it did occur?

7.2 The Risk Rating (R) is calculated by:

- $R = \text{Likelihood} \times \text{Severity}$

7.3 Risk Scoring Methodology & Risk Assessment

Severity Level			Minor	Moderate	Significant	Major	Catastrophic
			Minimal impact, no legal consequences, low reputational risk	Some disruption, internal disciplinary action likely	Breach of internal policy, potential breach of contract, reputational concern	Regulatory or legal implications, client trust impacted	Criminal offence, prosecution, major reputational and contractual damage
			1	2	3	4	5
Likelihood of the hazard happening	Almost Certain – Expected frequently or in most circumstances	5	5	10	15	20	25
	Likely – Will probably occur - occurs occasionally or in some areas	4	4	8	12	16	20
	Possible – Might occur at some point - a known but irregular risk	3	3	6	9	12	15
	Unlikely – Could occur at some time, but not expected	2	2	4	6	8	10
	Rare – Highly unlikely to occur – may happen in exceptional cases	1	1	2	3	4	5

Action Required		
Low (L)	1 - 5	Acceptable – monitor through routine procedures
Moderate (M)	6 - 10	Requires attention – implement or strengthen controls
High (H)	11-15	Unacceptable without controls – action required to mitigate
Critical (C)	16-25	Immediate action required – may warrant reporting to the board or externally
Examples of Persons at Risk		
Internal Personnel (I),		

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Subcontractors & Suppliers (S),
Labour – only Contractors (L)
Equipment Hire Companies (E)
Construction Companies (C)
Police or traffic enforcement (P)
Local residents and businesses (LR)
Regulatory body representatives(RB)

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Risk ID	At Risk	Risk	PRE-RCM				Risk Control Measures	POST-RCM				Responsible Person(s)
			Risk score (S x L)					Likelihood	Severity	Risk Score	Risk Level	
			Likelihood	Severity	Risk Score	Risk Level		Likelihood	Severity	Risk Score	Risk Level	
AB01	Commercial, Finance teams & Managers	Subcontractors offering gifts or incentives to gain work	4	4	16	H	<ul style="list-style-type: none"> a. Anti-bribery policy in place and communicated b. Staff trained to reject gifts c. All procurement decisions audited and approved by more than one person 	1	4	4	L	Commercial Manager
AB02	Site Supervisors, Operatives	Site supervisors receiving cash or favours from suppliers or workers	3	4	12	H	<ul style="list-style-type: none"> a. Code of conduct prohibits acceptance of personal incentives b. Whistleblowing procedure in place c. Financial controls in payroll 	1	4	4	L	Contracts Managers
AB03	QHSE Manager, Clients	Bribes offered to secure favourable inspections or approvals	2	5	10	M	<ul style="list-style-type: none"> a. QHSE audits conducted independently b. All inspection reports logged and reviewed centrally c. Staff trained on bribery law (Bribery Act 2010) 	1	5	5	L	QHSE Manager
AB04	Company reputation, Clients, Public	Third-party consultants acting improperly on behalf of the company	3	5	15	H	<ul style="list-style-type: none"> a. Due diligence on third parties; b. Anti-bribery clause in consultant contracts c. Regular review of consultant performance and declarations 	1	5	5	L	Managing Director

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AB05	All staff	Employees being unaware of what constitutes bribery	4	3	12	H	<ul style="list-style-type: none"> a. Company-wide anti-bribery training; induction sessions include bribery awareness b. Clear reporting routes for concerns (e.g. HR or anonymous hotline) 	1	3	3	L	QHSE Coordinator
AB06	Civils Managers, Permit Officers	Facilitation payments made to expedite permits or approvals on civil works	3	4	12	H	<ul style="list-style-type: none"> a. Zero-tolerance stance b. Documented approvals c. Liaison only through official channels d. Regular refresher training and integrity checks 	1	4	4	L	Civils Operations Manager
AB07	Entire Organisation	Staff or contractors failing to report observed bribery or corruption	3	4	12	H	<ul style="list-style-type: none"> a. Anonymous whistleblowing line; protected disclosure policy in place; regular reminders in toolbox talks and QHSE bulletins 	1	4	4	L	HR Officer