



CONSIDER IT DONE.

Risk Management Policy

Controlled Document	
Issue Status:	Issued
Issue Date:	18.03.2026
Policy No:	012
Issued to: (Person/Site)	Ted Soulsby / CID Group

Review and Amendments

Below is information relating to the periodic review and amendments made to this document following its original issue.

ACTIONS UNDERTAKEN	DATE	INITIAL
Reviewed & updated to 2026 gold standard	18.03.2026	OB

1. Purpose

The purpose of this policy is to define CID Trading Ltd's approach to identifying, assessing, and managing risks across its business activities.

2. Scope

This policy applies to all individuals working for or on behalf of CID Trading Ltd, including employees, contractors, suppliers, and business partners across all operations.

- Directors and officers
- Employees (permanent, temporary, or contract)
- Consultants, contractors, and agency staff
- Suppliers, agents, and business partners

3. Policy Statement

CID Trading Ltd is committed to managing risk in a structured and proportionate manner. We will identify, assess, control, and review risks and maintain a live risk register.

We are committed to:

- Acting professionally, fairly, and with integrity in all business dealings
- Complying with the UK Bribery Act 2010 and all applicable laws
- Preventing bribery and corruption across our operations and supply chain

Bribery includes offering, promising, giving, requesting, or accepting anything of value to gain a business advantage.

4. Prohibited Conduct

CID Trading Ltd identifies and manages risks across financial, operational, supplier, transport, production, health and safety, cyber, data, environmental, and business continuity areas.

- Offer, give, or receive bribes in any form
- Make or accept facilitation payments or "kickbacks"
- Offer gifts or hospitality intended to improperly influence decisions
- Accept gifts or hospitality where there is an expectation of favour

Gifts are only permitted where they are:

- Reasonable and proportionate
- Given openly and transparently
- Not cash or cash equivalents
- Compliant with applicable laws
- Approval must be obtained before offering or accepting anything involving government officials.

5. Third-Party and Supply Chain Compliance

Risks relating to suppliers and third parties are assessed and managed through approval, monitoring, and review processes to ensure continuity and compliance.

We are committed to:

- Conducting appropriate due diligence on third parties
- Monitoring supplier compliance where appropriate
- Taking action where breaches are identified, including termination of relationships

6. Risk-Based Approach

Risks are assessed based on likelihood and impact, and controls are applied proportionately to the level of risk identified.

We assess risks based on:

- Nature of business activities
- Geographic locations
- Third-party relationships

Controls and due diligence procedures are applied proportionately to the level of risk identified.

7. Financial Controls and Record Keeping

CID Trading Ltd maintains accurate records and appropriate operational and financial controls across all activities. All employees must:

- Accurately record all transactions
- Declare gifts and hospitality
- Ensure all expenses are properly documented and justified

No “off-the-books” accounts or concealed payments are permitted.

8. Sanctions and Legal Compliance

CID Trading Ltd complies with all applicable legal and regulatory requirements relating to business operations and risk management.

We are committed to complying with all relevant legal and regulatory requirements relating to anti-corruption and financial crime.

9. Reporting Concerns

All employees and stakeholders are encouraged to report risks, hazards, or concerns through line management or company procedures. Reports will be handled confidentially.

Concerns should be raised:

- Through line management, or
- In accordance with the CID Trading Limited Whistleblowing Policy

All reports will be treated confidentially, and no individual will suffer detriment for raising a genuine concern in good faith.

10. Training and Awareness

CID Trading Ltd ensures employees receive appropriate training and communication relating to risk management responsibilities.

- Employees receive appropriate training on anti-bribery and corruption
- This policy is communicated to all relevant staff and third parties

11. Monitoring and Enforcement

Compliance with this policy will be monitored through audits, reviews, and management oversight. Non-compliance may result in corrective or disciplinary action.

- Internal reviews and audits
- Management oversight
- Supplier and third-party assessments where appropriate

Breaches of this policy may result in:

- Disciplinary action (including dismissal)
- Termination of contracts with third parties
- Reporting to relevant authorities where required

12. Governance and Responsibility

The Board of Directors has overall responsibility. Day-to-day responsibility rests with senior management including the Managing Director, COO, Compliance Manager, and QHSE Manager.

Day-to-day responsibility rests with the Managing Director and designated responsible managers.

All employees and third parties are responsible for adhering to this policy.

13. Review

This policy will be reviewed annually or when significant changes occur in business operations or risk exposure.

THE SIGNATURE BELOW DEMONSTRATES THAT THIS DOCUMENT HAS BEEN AUTHORISED:

Company Name	CID Trading Ltd
Document Name	Risk Management Policy
Signed	
Print:	Ted Soulsby
Position	Managing Director
Date:	18/03/2026
Review Date:	18/03/2027