

## **Anti-Bribery and Corruption Policy**

### **1. Introduction**

1.1 Bristol Together CIC is committed to conducting all of its business activities with integrity, honesty, and transparency. We have a zero-tolerance policy toward bribery and corruption and are committed to complying with all relevant legislation, including the UK Bribery Act 2010. This policy outlines our stance on bribery and corruption and sets forth the guidelines that all employees, contractors, and stakeholders must adhere to in order to maintain the highest standards of ethical conduct.

### **2. Purpose**

2.1 The purpose of this Anti-Bribery and Corruption Policy is to:

2.11 Ensure compliance with applicable legislation and regulations regarding bribery and corruption.

2.12 Promote transparency and integrity in all business dealings.

2.13 Protect Bristol Together CIC, its employees, and stakeholders from potential legal and reputational harm.

2.14 Outline the consequences of engaging in bribery or corrupt practices.

### **3. Scope**

3.1 This policy applies to:

3.11 All employees, directors, officers, and contractors of Bristol Together CIC.

3.12 Any third parties, including suppliers, clients, agents, and other individuals or entities acting on behalf of Bristol Together CIC.

### **4. Definitions**

4.1 Bribery: The offering, giving, receiving, or soliciting of something of value as a means to influence the actions of an individual or organisation.

4.2 Corruption: Dishonest or illegal behaviour, especially by those in power, typically involving bribery.



- 4.3 Facilitation Payments: Small, unofficial payments made to expedite or secure the performance of a routine or necessary action to which the payer is legally entitled.

## 5. Policy Statement

- 5.1 Bristol Together CIC strictly prohibits:
- 5.11 Offering or Accepting Bribes: No employee, contractor, or representative of Bristol Together CIC may offer, give, or receive any form of bribe, whether in the form of money, gifts, hospitality, or other inducements.
- 5.12 Facilitation Payments: Bristol Together CIC does not condone or permit the use of facilitation payments in any form. Employees must decline and report any such requests immediately.
- 5.13 Third-Party Bribery: The organisation will not engage in bribery or corrupt practices indirectly through third parties such as suppliers, contractors, or agents acting on its behalf.
- 5.14 Political Contributions: Bristol Together CIC does not make political contributions as a way to gain or retain business advantage. Contributions to political parties must be transparent, lawful, and authorised by senior management.

## 6. Gifts and Hospitality

- 6.1 While occasional gifts and hospitality may be part of business relationships, employees and stakeholders must ensure that these are:
- 6.11 Reasonable and Proportionate: Any gifts or hospitality must be of modest value and appropriate for the circumstances.
- 6.12 Transparent: All gifts and hospitality offered or received must be disclosed and recorded in the company's register.
- 6.13 Not Intended to Influence: No gifts or hospitality should be accepted if it could be perceived as a means to influence business decisions or outcomes.

## 7. Responsibilities

- 7.1 Employees: All employees are responsible for understanding and complying with this policy. They must avoid any activities that could lead to or suggest a breach of this policy and must report any concerns or violations.



7.2 Management: Senior management is responsible for promoting a culture of integrity, ensuring compliance with the policy, and providing guidance and training to employees. Management must also monitor adherence to the policy and take swift action in cases of suspected bribery or corruption.

## **8. Reporting Violations**

8.1 Employees and stakeholders are encouraged to report any instances or suspicions of bribery or corruption through Bristol Together CIC's whistleblowing procedure. Reports can be made confidentially, and the company will ensure that no retaliation occurs against individuals who raise concerns in good faith.

## **9. Consequences of Non-Compliance**

9.1 Violations of this policy are taken seriously and may result in disciplinary action, including termination of employment or business relationships. Any individual or entity found to have engaged in bribery or corrupt practices may also be subject to legal action, including prosecution under the UK Bribery Act 2010.

## **10. Training and Awareness**

10.1 Bristol Together CIC will provide regular training to employees to ensure they understand this policy, the legal implications of bribery and corruption, and how to recognise and avoid such activities. This policy will be communicated to all new employees as part of their induction process.

## **11. Review and Monitoring**

11.1 This policy will be reviewed annually, or as needed, to ensure its effectiveness and compliance with legal and regulatory requirements. Bristol Together CIC is committed to continually improving its anti-bribery and corruption efforts.



Paul Morgan, Managing Director

Bristol Together CIC

For questions or concerns related to this policy, please contact Paul Morgan at

[paulmorgan@bristoltogether.co.uk](mailto:paulmorgan@bristoltogether.co.uk).

<b>Review Cycle:</b>	<b>Date of Review:</b>	<b>Reviewed by:</b>	<b>Next Date of Review:</b>
Annual	01/08/2024	Paul Morgan – Managing Director	01/08/2025