Date approved by Council: 14 October 2025

Anti-Corruption and Bribery Policy

1. POLICY STATEMENT

1.1. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and to implementing and enforcing effective systems to counter bribery and corruption.

1.2. We will uphold all UK laws relevant to countering bribery and corruption including the Bribery Act 2010.

2. ABOUT THIS POLICY

2.1. The purpose of this policy is to:

(a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and

(b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

2.2. It is a criminal offence to offer, promise, give, request or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. If we fail, as an employer, to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts and damage to our reputation. We therefore take our legal responsibilities very seriously.

2.3. In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents and advisers; government and public bodies, including their advisors, representatives and officials; politicians and political parties.

2.4. This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. WHO MUST COMPLY WITH THIS POLICY?

3.1. This policy applies to all persons working for us or on our behalf in any capacity, including senior managers (the Executive), officers, directors/Council Members, employees (both permanent and fixed term), consultants, contractors, agency staff, seconded workers, volunteers, interns and any other persons who will perform services for us or on our behalf (collectively referred to as employees and associated persons in this policy).

4. WHO IS RESPONSIBLE FOR THE POLICY?

4.1. The Executive Committee and Council Members have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

4.2. The Head of Governance has primary and day-to-day responsibility for implementing this policy, for monitoring its use and effectiveness and for dealing with any queries about it.

4.3. Management at all levels are responsible for ensuring those reporting to them understand and comply

with this policy.

4.4. Anti-bribery clauses, including reference to this policy, will be included in all contractual arrangements with third parties.

5. WHAT ARE BRIBERY AND CORRUPTION?

5.1. **Bribery** is offering, promising, giving or accepting any financial or other advantage to induce the recipient or any other person to act improperly in the performance of a person's functions, or to reward a person for acting improperly, or where the recipient would act improperly by accepting the advantage.

5.2. An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

5.3. A person acts **improperly** where that person acts illegally, unethically or contrary to an expectation of good faith or impartiality, or abuses a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

5.4. **Corruption** is the abuse of entrusted power or position for private gain.

6. WHAT YOU MUST NOT DO

6.1. It is not acceptable for you (or someone on your behalf) to:

(a) offer, give (or promise to give) a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

(b) give or accept a gift or hospitality during any commercial negotiations or tender process because it could be perceived as intended or likely to influence the outcome;

(c) accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for that third party or anyone else in return;

(d) accept hospitality from a third party that is unduly lavish or extravagant under the circumstances;

(e) offer or accept a gift to or from government officials or representatives, or politicians or political parties;

(f) threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy;

(g) under any circumstances accept a cash gift (or cash equivalent, such as vouchers); or

(h) engage in any other activity that might lead to a breach of this policy.

7. GIFTS, HOSPITALITY AND EXPENSES

7.1. Subject always to the prohibitions in paragraph 6 above, this policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of:

(a) establishing or maintaining good business relationships;

(b) improving or maintaining our image or reputation; or

(c) marketing or presenting our products and/or services effectively.

7.2. Gifts or hospitality of an individual value up to £50 to or from existing customers, suppliers and business partners are acceptable without declaration (subject always to the prohibitions in paragraph 6 above, and in particular other than cash, or any cash equivalent such as vouchers, which are never acceptable).

7.3. Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

8. RECORD-KEEPING

8.1. We must keep financial records and have appropriate internal controls in place to evidence the business reason for making payments to or receiving gifts or hospitality from third parties.

8.2. You must declare and obtain prior approval of all gifts and hospitality given or received with an individual value exceeding £50 or a cumulative value from any one or related individuals or organisations of £200 in any one year.

8.3. The process for submitting a request for gifts and hospitality approval can be found in Appendix 1. To obtain approval you must send an email with full details to both the Head of Governance and the CFO. The CFO will keep copies of all requests and actions taken.

8.4. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for the expenditure.

8.5. All accounts, invoices and other records relating to dealings with third parties, including suppliers and customers, must be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

9. YOUR RESPONSIBILITIES

9.1. You must ensure that you read, understand and comply with this policy.

9.2. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

9.3. You must notify the Head of Governance as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

10. HOW TO RAISE A CONCERN

10.1. You are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.

10.2. If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must:

(a) if you are a member of staff, notify your manager, the Head of Governance or the CFO, or, if you have concerns about reporting the matter internally, report it in accordance with our Speaking Up Policy, as soon as possible; or

(b) if you are not a member of staff, report it in accordance with our Speaking Up Policy as soon as possible.

10.3. If you are unsure about whether a particular act constitutes bribery or corruption you should raise it with your head of department (if you are a member of staff), the Head of Governance or the CFO or, if you

have concerns about reporting the matter internally, report it in accordance with our Speaking Up Policy.

11. PROTECTION

11.1. Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

11.2. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith any suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment then you should inform the Head of Governance immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure if you are an employee and the ACT Speaking Up Policy otherwise.

12. COMMUNICATION

12.1. Our zero-tolerance approach to bribery and corruption must be communicated at the outset of the business relationship with all suppliers, contractors and business partners and reinforced as appropriate thereafter.

13. BREACHES OF THIS POLICY

13.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

13.2. Any member of the ACT's Council who breaches this policy will face action, which may lead to the Council member's removal from Council and, if also a potential breach of the ACT's Ethical Code, the Council member will be subject to investigation and possible sanction under the ACT's Disciplinary Rules.

13.3. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Appendix 1

The process for obtaining approval of the receipt of gifts and hospitality

1. Send an email to both the Head of Governance and the CFO including the following information:
a. Name and title of recipient
b. Date(s) of offer/receipt of gift/hospitality
c. Nature of gift/hospitality
d. Reason/justification for the gift/hospitality
e. Value (or approximate if not known)
f. Name(s) and address(es) of donor(s)
g. Description of the relationship with the donor, including whether the donor is a current or potential partner (e.g. supplier, sponsor, etc.)
h. State whether the gift/hospitality been made in advance of a potential award of a contract to the donor
i. If 'Yes' to the above, specify the details
j. State whether any of the following apply, and if so provide further information i. you know or suspect the intention behind the gift is to influence someone to act improperly ii. the gift seems excessive in the circumstances iii. the gift could reasonably be perceived to be detrimental to the ACT's reputation
k. State whether you are aware of any other reason the gift/hospitality should be rejected, and if so provide further information
2. Either the Head of Governance or the CFO will consider the request and notify the requester of the decision.
3. The CFO will keep copies of all requests and actions taken.