

# Anti-bribery & Corruption Policy

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| DOCUMENT CONTROL         |   |                 |  |
|--------------------------|---|-----------------|--|
| Document code:           | UKA_BRC_001   | Effective from: |  |
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| Linked Ofqual General    | Bribery Act 2010  |                 |  |
| Conditions and other     |   |                 |  |
| regulatory requirements: | Ofqual General Conditions and other associated regulatory requirements. |                 |  |
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| date:                    |   | 30/11/2025      |  |
| Classification level:    | Public  |                 |  |

Approved by: Executive Leadership

**Date approved:** 30/11/2024

| Version number: | Date:   | Changes:                                    |
|-----------------|---------|---|
| V0.1            | 12-2024 | Final review and approval by Executive Team |
|                 |         |   |



#### 1. Policy Statement

- 1.11 UK Awards is committed to conducting its business with integrity, transparency, and accountability. Bribery and corruption in any form will not be tolerated.
- 1.12 1.2 We comply with all relevant UK legislation, including the Bribery Act 2010, and expect all employees, contractors, suppliers, and stakeholders to uphold these standards.

#### 2. Purpose

- 2.11 The purpose of this policy is to:
  - Define what constitutes bribery and corruption.
  - Outline expectations for employees and associated persons.
  - Establish procedures for reporting and addressing concerns.

#### 3. Scope

- 3.11 The policy applies to:
  - All employees, officers and directors of UK Awards.
  - Contractors, consultants, suppliers, business partners, and third parties acting on behalf of UK Awards.
  - Any individual or entity associated with UK Awards, regardless of location.

#### 4. Definitions

- 4.11 **Bribery:** Offering, giving, receiving, or soliciting something of value as an inducement or reward for an improper action.
- 4.12 **Corruption:** Abuse of power or position for personal gain.
- 4.13 **Facilitation payments:** Small, unofficial payments to expedite routine government actions, which are illegal under UK law.

#### 5. Prohibited Activities

- 5.11 The following activities are strictly prohibited:
  - Offering or accepting bribes in any form.
  - Making facilitation payments.



- Offering or accepting gifts or hospitality intended to influence decision-making.
- Engaging in fraudulent activities.

# 6. Gifts and Hospitality

- 6.11 Modest gifts and hospitality may be given or received if they are:
  - Reasonable and proportionate.
  - Not intended to influence business decisions.
  - Declared and recorded in the Gifts and Hospitality Register.
- 6.12 Cash gifts or lavish hospitality are strictly prohibited.

# 7. Charitable Donations and Sponsorships

- 7.11 UK Awards may support charities, but all donations must be:
  - Transparent and properly recorded.
  - Not used to gain undue influence.
  - Approved by senior management.

#### 8. Responsibilities

- 8.11 All employees and associated persons must:
  - Familiarise themselves with this policy and comply with its terms.
  - Report any suspected bribery or corruption.
  - Seek guidance from Senior Leadership if uncertain about any transaction.

# 9. Reporting and Whistleblowing

- 9.11 Suspected bribery or corruption must be reported immediately to Senior Leadership.
- 9.12 Reports will be treated confidentially, and individuals raising concerns in good faith will be protected from retaliation.
- 9.13 Reports can be made via:
  - Email: <a href="mailto:compliance@ukawards.org.uk">compliance@ukawards.org.uk</a>
  - Post: UK Awards, [INSERT ADDRESS]

# 10. Investigation and Consequences



- 10.11 All reports will be investigated promptly, fairly, and impartially.
- 10.12 Employees found guilty of bribery or corruption may face disciplinary action, including dismissal.
- 10.13 UK Awards reserves the right to refer serious matters to law enforcement authorities.

# 11. Training and Awareness

- 11.11 Anti-bribery and corruption training will be provided to employees and key stakeholders.
- 11.12 Regular updates and refresher courses will be conducted to reinforce compliance.

# 12. Monitoring and Review

- 12.11 This policy will be reviewed annually to ensure effectiveness and compliance with legal requirements.
- 12.12 Any necessary updates will be communicated to all stakeholders.

#### 13. Contact Information

For further inquiries regarding access arrangements and reasonable adjustments, please contact:

Email: info@ukawards.org.uk