



Anti-Corruption and Bribery Policy

POLICY STATEMENT

It is the policy of both The Carbon Community and Carbon Community Trading Ltd to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption, are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and apply appropriate systems to counter bribery.

This policy governs The Carbon Community (Registered Charity in England and Wales 1187231) and Carbon Community Trading LTD (12973020). All proceeds from Carbon Community Trading support The Carbon Community. Throughout this document we will refer to both organisations as Carbon Community.

PURPOSE

The Carbon Community and Carbon Community Trading Ltd are committed to conducting their work with honesty, integrity, and in compliance with all relevant laws, including the **Bribery Act 2010**.

The purpose of this policy is to:

- Prevent bribery and corruption in all activities carried out by or on behalf of the Carbon Community.
- Provide guidance to trustees, staff, volunteers, and partners on recognising and preventing corrupt practices.
- Protect the Carbon Community's reputation, beneficiaries, and assets.

SCOPE AND APPLICABILITY

This policy applies to:

- Trustees
- Directors
- Employees (full-time, part-time, temporary)
- Volunteers
- Contractors, consultants, and agents
- Anyone acting on behalf of the Carbon Community.

All individuals covered must comply with this policy at all times.

The Carbon Community is a UK Registered Charity number 1187231,
and formed as a private company limited by guarantee, registration number 12273280.

Registered Address: 40 Alma Road, Windsor, SL4 3HJ, United Kingdom.
Contact Address: 42 Free Street, Brecon, Powys, LD3 7BN

DEFINITIONS

A bribe is an inducement or reward offered, promised, or provided to improperly gain any commercial, contractual, regulatory, or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe.
- receiving or requesting a bribe; or
- bribing a public official.

Corruption is the abuse of entrusted power for private gain, including fraud, embezzlement, favouritism, or misuse of charity resources.

Improper advantage is any benefit not legitimately earned, whether financial or otherwise.

PROHIBITED CONDUCT

The following are strictly prohibited:

- Offering or accepting bribes in any form.
- Making facilitation payments (small payments to expedite routine processes).
- Offering or accepting lavish gifts or hospitality intended to influence decisions.
- Using funds or assets for personal benefit.
- Engaging in fraudulent, deceptive, or dishonest behaviour.
- Failing to disclose a conflict of interest.

Breaching this policy may result in disciplinary action, including dismissal, termination of contract, or referral to relevant authorities.

GIFTS AND HOSPITALITY

The Charity recognises that modest gifts or hospitality may be a normal part of charitable or fundraising activities. However:

- Gifts or hospitality **must never** influence — or appear to influence — decisions.
- All gifts or hospitality **over £50** must be declared and recorded in the Charity's Gifts & Hospitality Register.
- Cash gifts must never be accepted.
- If unsure, individuals should consult the Charity's Chair.

The intention behind the gift should always be considered.

CONFLICTS OF INTEREST

All trustees, staff, and volunteers must:

- Declare any personal interests that could influence decision-making.
- Not participate in decisions where a conflict exists.

Carbon Community will maintain a register of interests.

DUE DILIGENCE ON PARTNERS AND SUPPLIERS

When engaging suppliers, contractors, or partner organisations:

- Reasonable checks must be undertaken to ensure they are reputable and compliant with anti-corruption laws.
- Agreements must include appropriate clauses preventing bribery or improper conduct.
- High-risk transactions must be approved by the Board or delegated authority.

REPORTING CONCERNS

Carbon Community encourages openness and will support anyone who raises genuine concerns. Individuals must report any concerns or suspicions of bribery or corruption to:

- The Chair of Trustees, or
- Carbon Community's designated safeguarding/compliance lead

Reports may be made confidentially. Victimisation of whistleblowers is prohibited.

RESPONSIBILITIES

Trustees

- Ensure effective anti-corruption systems are in place.
- Review this policy regularly.

Staff and Volunteers

- Comply with the policy.
- Attend any required training.
- Report concerns promptly.

RECORD-KEEPING

Carbon Community will maintain:

- A Gifts & Hospitality Register
- A Register of Interests
- Records of due diligence on suppliers/partners
- Accurate financial records to evidence business justification for all transactions

TRAINING AND COMMUNICATION

This policy will be:

- Provided to all trustees, staff, and volunteers
- Included in induction processes
- Reviewed periodically and updated as needed

MONITORING AND REVIEW

The Board of Trustees will:

- Review this policy at least every three years
- Assess compliance and identify improvements
- Ensure the Carbon Community remains compliant with the Bribery Act 2010 and Charity Commission expectations

Date Adopted: 24 November 2025

Review Date: December 2028