



## Anti-Bribery Policy

<b>Approval date: 20/04/2026</b>	<b>Approved by: Board</b>
<b>Applies to:</b> All Board Members, officers, employees, contractors, consultants and agents acting on behalf of the Board.	<b>Linked Documents:</b> Members Code of Conduct, Whistle Blowing Policy   Gifts and Hospitality Policy   Anti-Fraud and Corruption Policy.
<b>Frequency of review: 3 years</b>	<b>Next review date: April 2029</b>

### 1. Introduction

The Bribery Act 2010 came into force on 1st July 2011 and is intended to modernise the law on bribery. Bribery can be defined as giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so.

### 2. Scope

This policy applies to all Board Members, employees, agency workers, contractors, consultants, and any third parties acting on the Board's behalf.

### 3. Policy Statement

- Takes a zero-tolerance approach to all forms of bribery and corruption.
- Is committed to acting professionally, ethically, fairly, and with integrity in all business dealings and relationships.
- Will implement and enforce effective systems and controls to detect and prevent bribery.

### 4. Prohibited Conduct

The following are strictly prohibited:

- Offering, giving, soliciting, or receiving a bribe, whether in the form of cash or any other inducement, in order to obtain or retain a business advantage, secure a contract, or gain personal benefit.
- Authorising a third party to offer or accept a bribe on the Board's behalf.
- Making facilitation payments (i.e. unofficial payments to expedite routine government actions).
- Providing or receiving excessive hospitality or gifts intended to influence decision-making.

### 5. Responsibilities

Board Members and managers are responsible for promoting a culture of integrity and ensuring awareness of this policy.

All staff and representatives are responsible for compliance with this policy and reporting any suspected bribery.



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Any concerns should be reported in accordance with the Board's Whistleblowing Policy or to the Clerk directly.

### 6. Breaches and Sanctions

Any breach of this policy may result in disciplinary action, including dismissal for gross misconduct. Breaches may also lead to criminal prosecution under the Bribery Act 2010.

### 7. Monitoring and Review

The effectiveness of this policy will be reviewed every three years or sooner if required by changes in legislation or guidance.

#### Version Control

Version	Date Approved	Summary of Changes
1.0	20/04/2026	Initial policy approved