



**Accelerate
People**

Anti-Bribery Policy

Welcome to Accelerate

Classification: Internal

Version History		
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Contents

<u>1.</u>	<u>POLICY STATEMENT</u>	<u>4</u>
<u>2.</u>	<u>OFFENCES</u>	<u>4</u>
<u>3.</u>	<u>PURPOSE</u>	<u>4</u>
<u>4.</u>	<u>WHO IS COVERED BY THE POLICY</u>	<u>4</u>
<u>5.</u>	<u>WHAT IS BRIBERY AND CORRUPTION</u>	<u>5</u>
<u>6.</u>	<u>POLICY</u>	<u>5</u>
<u>7.</u>	<u>GIFTS AND HOSPITALITY</u>	<u>6</u>
<u>8.</u>	<u>DONATIONS</u>	<u>6</u>
<u>9.</u>	<u>RESPONSIBILITIES</u>	<u>6</u>
<u>10.</u>	<u>HOW TO RAISE A CONCERN</u>	<u>7</u>
<u>11.</u>	<u>WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION</u>	<u>7</u>
<u>12.</u>	<u>PROTECTION</u>	<u>7</u>
<u>13.</u>	<u>WHO IS RESPONSIBLE FOR THE POLICY</u>	<u>7</u>
<u>14.</u>	<u>MONITORING AND REVIEW</u>	<u>8</u>

1. Policy Statement

Accelerate People's policy is to conduct its business in an honest and ethical manner and to act in good faith. 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 implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct.

2. Offences

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official;
- as a commercial organisation, to fail to prevent a bribe.

If any party were found guilty by a court of committing bribery, they could face up to 10 years in prison and/or an unlimited fine. Accelerate People could also face prosecution and be liable to pay a fine.

3. Purpose

The purpose of this policy is to convey to all employees and interested parties of Accelerate People the rules of the Company in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Accelerate People conduct its business in a fair, professional and legal manner.

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, training providers, business contacts (employers), consultants, and Learner's.

This policy will:

- 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.

4. Who is Covered by the Policy

This policy applies to all employees of Accelerate People, regardless of seniority or site, including employees, freelancers and Governing Body members (whether permanent, fixed-term or temporary (collectively referred to as staff in this policy). It also extends to

anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement.

5. What is Bribery and Corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business:

- Giving or receiving money, gifts, meals, entertainment or anything else of value.
- As an inducement to a person to do something which is dishonest or illegal.

6. Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for Accelerate People, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the Responsible Officer so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to the Responsible Officer. You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules.

Accelerate People will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Accelerate People takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise.

We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self-employed, an agency worker, contractor etc.

If you are a Centre, sanctions may be imposed.

Employees are reminded of the Whistleblowing Policy which is available on Hibob.

7. Gifts and Hospitality

This policy does not prohibit normal and appropriate hospitality given to or received from third parties where nothing is expected in return. This can help form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from a Senior Officer. Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from a Senior Officer.

A record will be made of every instance in which gifts or hospitality are given or received.

As the law is constantly changing, this policy is subject to review and Accelerate People reserves the right to amend this policy without prior notice.

8. Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices and typically for the purposes of education. Accelerate People may occasionally support fundraising events organised by staff. No donation must be offered or made without the prior approval of a Senior Officer.

9. Responsibilities

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

The Responsible Officer must be notified as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which may result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other interested parties if they breach this policy.

10. How to Raise a Concern

Employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Responsible Officer. Concerns should be reported by following the procedure set out in the Whistleblowing Policy.

11. What to do if you are a Victim of Bribery or Corruption

It is important that you tell the Responsible Officer as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

12. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. Accelerate People will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

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 their 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, you should inform the Responsible Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally to a Senior Officer in writing.

13. Who is Responsible for the Policy

The governing body has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The senior management team have primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

The Responsible Officer is responsible for collating examples, monitoring records of gifts and hospitality.

14. Monitoring and Review

The quality and compliance board will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made at the earliest opportunity.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.

Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Responsible Officer.

This policy does not form part of any employee's contract of employment and as the law is constantly changing, this policy is subject to review and Accelerate People reserves the right to amend this policy without prior notice.

Accelerate People may also report any matter to the relevant authorities including the Serious Fraud Office, HMRC, Crown Prosecution Service and/or the police or other relevant agency.



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