



## ANTI-BRIBERY AND CORRUPTION POLICY 2024

Date Created	01/06/2025
Status	Final
Version	5.0
Review Date	01/06/2026
Owner	Data Protection Officer
Approved By	Managing Partner

### 1. SCOPE

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Greenway Training Ltd business is conducted in a socially responsible manner.

This policy covers:

- Bribes
- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions.

### 2. RESPONSIBILITIES

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 customers, suppliers, business contacts, contractors, advisers, and government and public bodies, including their advisors, representatives and officials.

This policy applies to all individuals working at Greenway Training Ltd (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, or any other person associated with us.

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. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify Greenway Training Ltd as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

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

Greenway Training Ltd has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Greenway Training Ltd has the day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

### 3. POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We 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, in respect of our conduct.

Bribery and corruption are punishable for individuals by imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

### **3.1 Bribes**

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Employees must not engage in any form of bribery, either directly or through any third party.

### **3.2 Gifts and hospitality**

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable.

- Employees must not offer or give any gift or hospitality which could be regarded as illegal or improper which exceeds £50.00 in value for each individual gift or hospitality (not to exceed a total value of £100 in any financial year), unless approved in writing by Greenway Training Ltd
- Employees may not accept any gift or hospitality from our business partners if: it exceeds £50.00 in value for each individual gift or hospitality (not to exceed a total of £100 in any financial year), unless approved in writing by Greenway Training Ltd or there is any suggestion that a return favour will be expected or implied.
- If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to Greenway Training Ltd and donated to charity
- The intention behind the gift should always be considered.

### **3.4 Charitable and Political Contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of Greenway Training Ltd. All charitable contributions should be publicly disclosed.

## **4. PROCEDURE**

### **4.1 How to raise a concern**

You 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 or concerns, these should be raised with Greenway Training Ltd

### **4.2 What to do if you are a victim of bribery or corruption**

It is important that you tell Greenway Training Ltd 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.

#### **4.3 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. 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.

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 Greenway Training Ltd. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

#### **4.4 Training and communication**

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

#### **4.5 Monitoring and review**

Greenway Training Ltd will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

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

#### **4.6 Record keeping**

Greenway Training Ltd keep financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties. Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.