Anti-Bribery Policy

PRN-005: ANTI-BRIBERY POLICY
Company Name: AI Auto-Tech Ltd
Trading/Business Name: Trusted Companionship
Company Registration Number: 15556946
SIC Code: 88100 – Social Work Activities Without Accommodation for the Elderly and Disabled
Email: info@trustedcompanionship.com
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Purpose

The purpose of this policy is to establish a clear framework for preventing, identifying, reporting, and responding to bribery and corrupt practices within the organisation. The organisation is committed to conducting all business activities ethically, transparently, and in compliance with applicable legal and regulatory requirements.

This policy promotes a culture of integrity and ensures that all employees and associated persons understand their responsibilities in preventing bribery.

Scope

This policy applies to:

- All employees, whether permanent, temporary, full-time, or part-time.
- Directors, trustees, officers, and senior management.
- Volunteers and agency staff.
- Contractors, consultants, advisors, suppliers, and business partners acting on behalf of the organisation.
- Any individual or entity representing or conducting activities for the organisation.

The policy applies to all organisational activities, regardless of geographical location.

Policy Statement

The organisation maintains a zero-tolerance approach to bribery and corruption.

No employee or representative shall:

- Offer, promise, give, request, or accept a bribe.
- Facilitate improper payments or inducements.
- Use organisational funds or resources to influence decisions improperly.
- Provide gifts, hospitality, donations, or sponsorships intended to secure unfair business advantages.
- Conceal, misrepresent, or fail to record financial transactions accurately.

All business dealings must be conducted honestly, fairly, and transparently.

Any suspected bribery or corrupt activity must be reported immediately through the organisation's reporting procedures.

No individual will suffer retaliation for raising a genuine concern regarding suspected bribery.

Responsibilities

Board of Directors / Trustees

The Board is responsible for:

- Approving and supporting this policy.
- Promoting ethical conduct throughout the organisation.
- Providing oversight of anti-bribery compliance arrangements.

Senior Management

Senior Management shall:

- Implement effective controls to prevent bribery.
- Ensure employees are aware of this policy.
- Investigate allegations appropriately.
- Monitor compliance across all operational areas.

Line Managers

Line Managers are responsible for:

- Encouraging ethical behaviour.
- Identifying risks within their areas of responsibility.

- Escalating concerns promptly.

Employees and Representatives

All personnel must:

- Comply with this policy.
- Refuse participation in bribery or corrupt activities.
- Report actual or suspected breaches.
- Participate in required training.

Compliance or Governance Function

The designated compliance function shall:

- Maintain monitoring systems.
- Conduct compliance reviews.
- Provide guidance and training.
- Maintain records of reports and investigations.

Procedures / Standards

1. Gifts and Hospitality

Reasonable and proportionate gifts or hospitality may be accepted or offered where they:

- Are lawful.
- Are transparent.
- Do not influence decision-making.
- Are consistent with organisational procedures.

The following are prohibited:

- Cash gifts or cash equivalents.
- Excessive entertainment.
- Gifts intended to obtain an improper advantage.

Where required, gifts and hospitality shall be declared and recorded in the appropriate register.

2. Facilitation Payments

Facilitation payments are prohibited regardless of value.

Any request for such payments must be reported immediately.

3. Third-Party Relationships

Due diligence shall be conducted where appropriate before engaging:

- Suppliers.
- Contractors.
- Consultants.
- Agents.
- Business partners.

Third parties must be informed of the organisation's expectations regarding ethical conduct.

4. Charitable Donations and Sponsorship

Donations and sponsorships must:

- Be properly authorised.
- Serve a legitimate purpose.
- Be accurately recorded.
- Never be used to disguise bribery.

5. Reporting Concerns

Employees should report concerns using established reporting mechanisms, including:

- Line management.
- Human Resources.
- Governance or Compliance functions.
- Whistleblowing arrangements.

Reports will be treated confidentially wherever possible.

6. Investigation Process

All allegations shall be:

1. Recorded.
2. Assessed promptly.

3. Investigated proportionately.
4. Documented appropriately.
5. Resolved with corrective action where necessary.

7. Training and Awareness

Relevant personnel shall receive periodic training covering:

- Bribery risks.
- Reporting responsibilities.
- Ethical decision-making.
- Organisational requirements.

Case Study

Scenario

A supplier competing for a contract offers a procurement employee an expensive weekend trip and luxury accommodation before the contract award decision.

Risk

Acceptance of the offer could create an actual or perceived conflict of interest and could constitute bribery.

Required Action

The employee should:

1. Politely decline the offer.
2. Report the incident to their manager and the Compliance function.
3. Record the offer in the gifts and hospitality register if required.
4. Avoid participating in procurement decisions where impartiality may be questioned.

Outcome

By refusing and reporting the offer, the employee protects both themselves and the organisation from legal, financial, and reputational risks.

Monitoring and Quality Assurance

The organisation will monitor compliance through:

- Internal audits.
- Management reviews.
- Risk assessments.
- Investigation outcomes.
- Gifts and hospitality register reviews.
- Staff training completion records.
- Whistleblowing and incident reporting trends.

Corrective actions will be implemented where weaknesses are identified.

Review Arrangements

This policy shall be reviewed:

- Every two years; or
- Earlier where there are legislative, regulatory, organisational, or operational changes.

Reviews will assess:

- Effectiveness of controls.
- Emerging bribery risks.
- Compliance performance.
- Lessons learned from incidents and investigations.

Related Policies

This policy should be read in conjunction with:

- Code of Conduct Policy
- Whistleblowing Policy
- Conflict of Interest Policy
- Financial Management Policy
- Procurement and Purchasing Policy

- Fraud Prevention Policy
- Disciplinary Policy
- Records Management Policy
- Risk Management Policy