



ANTI BRIBERY STATEMENT

Bribery is a serious criminal offence, and corrupt acts expose the organisation and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the organisation's reputation. Bribery is strictly prohibited. This is not just a cultural and moral commitment on the part of the organisation, it is a legal requirement.

The organisation has a strict anti-bribery and corruption policy in line with the Bribery Act (2010). A bribe is 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.

If you bribe (or attempt to bribe) another person, intending either to obtain or retain business for the company, or to obtain or retain an advantage in the conduct of the company's business this may be considered gross misconduct. Similarly accepting or allowing another person to accept a bribe may be considered gross misconduct. In these circumstances you will be subject to formal investigation under the organisation's disciplinary procedures, and disciplinary action up to and including dismissal may be applied.

ANTI BRIBERY POLICY

Introduction

The Caldecott Foundation is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is the Foundation's policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for the Caldecott Foundation, including anyone providing services to the organisation such as consultants or contractors.

Policy Aim

The aim of this policy is to help the Caldecott Foundation act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

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Definitions

- **Bribe** is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.
- **Hospitality** is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.
- **Kickbacks** or facilitation payments are typically small payments made in return for a business favour or advantage.

The Law

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years imprisonment. If the Foundation is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

Scope

This policy applies to all permanent and fixed-term staff employed by the Caldecott Foundation, and any contractors, consultants or other persons acting under or on behalf of the Foundation.

The Foundation will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
- Make, or accept, “kickbacks” of any kind.

The Caldecott Foundation will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

Risk Assessment

The Caldecott Foundation will continue to assess the risk that bribery poses to the organisation. The assessment will include the consideration of the nature and extent of its exposure to potential external and internal risks of bribery. The assessment will be

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carried out on a regular basis and monitored by the senior management, the Audit and Risk committee, Finance Committee and the Board of Trustees.

Communication (Including Training)

The Caldecott Foundation's stance on bribery will be clearly communicated to all employees during their induction and training. The training will support individuals to address situations where bribery may occur and place emphasis on the anti-bribery culture within the organisation.

There will be ongoing monitoring of any activities considered to be 'high risk' with regular reviews carried out by the senior management team. If issues are identified through the process, they will be immediately addressed and remedial action taken at the direction of the Chief Executive Officer and Board of Trustees.

Employee Responsibility

Employees must not:

- Accept any financial or other reward from any person in return for providing some favour.
- Request a financial or other reward from any person in return for providing some favour.
- Offer any financial or other reward from any person in return for providing some favour.

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Receiving Business gifts - Receiving promotional gifts of low value is normal and appropriate; however, gifts with a value exceeding £25.00 may not be accepted without approval. Any gift offered and then refused because of its value, must be reported to the Chief Executive Officer.

Offering Business gifts - Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality - The acceptance of corporate hospitality must be transparent; all invitations must be reported to the Chief Executive Officer before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- business and travel expenses incurred.
- normal business lunches and meals.

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Offering gifts and hospitality - Caldecott Foundation hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval from the Chief Executive Officer.

Donations to organisations - No donations should be made to charities, political parties or other organisations without approval.

Non-Compliance by Staff

Failing to observe this policy may lead to disciplinary action in accordance with the organisation's Disciplinary Policy.

Visitors

In the event of an identified breach of the policy by other organisations, or individuals, the Caldecott Foundation will take appropriate action.

Monitoring Policy

Monitoring of the policy is essential to assess how effective the Caldecott Foundation has been to establish control of its obligations.

The following will be monitored:

- That all individuals working for the Caldecott Foundation are advised of the policy.
- Assessment of any reported incident or related occurrence.

Reviewing Policy

This policy will be reviewed and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

Policy Amendments

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Caldecott Foundation senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.