



Heart of England Training Ltd

# Anti-Bribery

## Policy 2022



## 1. Introduction

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Without exception, Heart of England Training strictly prohibits bribery and corruption in any form. The company commits to: -

- Conducting business fairly, honestly and transparently
- Not making or offering bribes whether directly or indirectly to gain business advantages
- Not accepting bribes, whether directly or indirectly to give business advantages

## 2. Definition

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Bribery is the most common form of corruption. Bribery involves the offering, giving, receiving or soliciting of money, a gift or other financial advantage as an inducement to do something that is improper, illegal or a breach of trust in the course of doing business. This includes any payment through a third party and a recipient acting or failing to act in anticipation of receiving financial or other advantage.

## 3. Positive Action

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Heart of England Training is committed to following the principles of integrity, transparency and accountability in line with the Bribery Act 2010 and other relevant legislation. Any violation of this policy by an employee may result in disciplinary action up to and including termination of employment. All staff conducting business on behalf of the company must abide by the principles. Heart of England Training commits to: -

- Carrying out business fairly, honestly and openly
- Not paying or offering to pay bribes or condone the offering of bribes to any third party to gain new business or a business advantage
- Not accepting bribes or agree to them being accepted on the company's behalf in order to influence business
- Not accepting any form of gift or benefit from its customers, suppliers, learners or business contacts
- Avoiding business with other who do not accept the same values and may harm the company's reputation
- Ensure all employees, partners and stakeholders are aware of the company's principles

## 4. Procedures for dealing with non-compliance

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Heart of England Training must insist all employees adhere to this policy. Anyone suspecting non-compliance with the company policy must report their concerns immediately to the

directors. Heart of England Training will take appropriate disciplinary action up to and including termination of employment against any employees in breach of the regulations.

The company will always ensure that no employee will suffer any penalty for reporting or refusing to engage in bribery.

This policy is reviewed annually by the company directors and Governors.

**Version:** 10

**Prepared by:** Directors

**Approved by:** Governors

**Effective date:** September 22

**Review date:** August 2022

**Date to be reviewed:** July 2023