

1. POLICY STATEMENT

- 1.1 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 and are committed to acting professionally, fairly and with integrity in all our relationships and business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 The purpose of this policy is to:
- (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.
- 1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine and face damage to our reputation. We therefore take our legal responsibilities very seriously.
- 1.5 We have identified that certain of our activities create particular risks for our organisation, in particular:
- (a) Overseas collaborations, joint ventures and partnerships (whether formal or informal);
 - (b) Recruitment of students, particularly overseas;
 - (c) Receipt of gifts and donations;
 - (d) Grant funding; and
 - (e) Public procurement, particularly where the activities relate to construction.
- 1.6 To address these risks we have taken the following steps:
- (a) Implemented an anti-bribery and corruption policy;
 - (b) Undertaken a risk assessment exercise, which will be subject to on- going review;
 - (c) Undertaken a training programme of senior management;
 - (d) Taken steps to implement a training programme for all individuals operating in areas of the organisation that are perceived as high risk;
 - (e) Appointed the Vice- Provost (Operations) as the Compliance Manager to ensure compliance with Bribery Act issues;
 - (f) Reviewed and amended policies related to this Anti-corruption and Bribery Policy, including the Public Interest Disclosure Policy; and
 - (g) Prepared standard clauses relating to Bribery Act issues for inclusion in key contractual documentation.
- 1.7 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, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Signed:



Name: Rob Smith

Position: Director (Owner)

Date: 05th January 2022