ANTI-BRIBERY POLICY

Date Last Approved	November 2024
Next Review date	November 2027
Responsible officer	Christina Friedenthal Corporate Services Director
Approver	Board of Management

1. Introduction

1.1 CDS is committed to the highest standards of ethical conduct and integrity in its business activities.

1.2 This policy outlines the organisation's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010.

1.3 CDS will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf.

1.4 The Board and Senior Management Team are committed to implementing effective measures to prevent, monitor and eliminate bribery.

2. Scope of the policy

2.1 This policy applies to all employees and officers of CDS and also to temporary workers, consultants, contractors and agents acting for, or on behalf of, CDS ("associated persons").

2.2 Every employee and associated person acting for, or on behalf of, the organisation is responsible for maintaining the highest standards of business conduct.

2.3 The Bribery Act 2010 makes it a criminal offence to give or receive a bribe. It also makes failing to prevent bribery a corporate offence.

2.4 Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of CDS.

2.5 CDS may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that we may issue from time-to-time.

2.6 This policy covers:

- The main areas of liability under the Bribery Act 2010
- The responsibilities of any employees and associated persons acting for, or on behalf of, CDS, and
- The consequences of any breaches of this policy.

3. Bribery Act 2010

3.1 Under the Bribery Act 2010, a bribe is defined as a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity, or
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

3.2 A financial advantage can be anything with a value greater than £0.

3.3 A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially or in accordance with a position of trust.

3.4 A criminal offence will be committed under the Bribery Act 2010 if:

- An employee or associated person acting for, or on behalf of, the organisation offers, promises, gives, requests, receives or agrees to receive bribes, or
- An employee or associated person acting for, or on behalf of, the organisation offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of their duties (where local law does not permit or require such influence), and
- CDS does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

3.5 All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

4. Anti-Bribery Policy Statement

4.1 CDS values our reputation for ethical behaviour and for financial probity and reliability and has zero tolerance for all forms of bribery and corruption.

4.2 **CDS prohibits:**

- Offering, giving, soliciting or accepting any bribe, whether cash or another kind of inducement;

To or from

- Any person or company, whether they are a public official or body or private person or company;

By

- Any employee, Board member, agent or other person or body acting on our behalf;

In order to

- Gain any commercial contractual, financial or regulatory advantage for CDS in a way that is unethical;

Or in order to

- Gain any personal advantage, monetary or otherwise, for the individual or anyone connected with the individual.

4.3 CDS will communicate this policy to all employees and associated persons, as well as to agents, contractors or consultants providing services on our behalf.

5. What is prohibited?

5.1 CDS prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe.

5.1.1 The bribe may be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, policy party or a private person or organisation, regardless of whether the employee or associated person is situated in the UK or overseas.

5.1.2 The bribe might be made to ensure that a person or organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the organisation in either obtaining or maintaining organisation business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

5.1.3 This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers suppliers or other third parties/

5.2 CDS does not make and will not accept facilitation payments or “kickbacks” of any kind.

5.2.1 Facilitation payments are typically small, unofficial payments made to secure or speed up a routine action.

5.2.2 Kickbacks are typically payments made in return for a commercial favour or advantage.

5.3 All staff must avoid any activity that might lead to, or suggest that, a facilitation payment or kickback will be made or accepted by CDS.

6. Records

6.1 Employees and, where applicable, associated persons, are required to take particular care to ensure that all CDS and client records for which we are responsible are accurately maintained I relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

6.2 Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier or services, agent, consultant or representative, in accordance with all relevant procurement and risk management procedures and practices.

6.3 Employees and associated persons are required to keep accurate, detailed and updated records of all corporate hospitality, entertainment or gifts accepted or offered.

7. Reporting

7.1 CDS depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings.

7.2 Employees and associated persons are requested to assist the organisation and to remain vigilant in preventing, detecting and reporting bribery.

7.3 Employees and associated persons are encouraged to report any concerns that they may have to their line manager.

7.4 Concerns should be reported by following the procedures in the staff Code of Conduct related to Public Interest Disclosure. Issues that should be reported include:

- Any suspected or actual attempts at bribery
- Concerns that other employees or associated persons may be being bribed, or
- Concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

8. Monitoring and Review

8.1 CDS will regularly communicate its anti-bribery measures to employees and associated persons.

8.2 We will conduct training sessions, where applicable.

8.3 The Corporate Services Director is responsible for the implementation of this policy, including monitoring and reviewing related policies and procedures on expenses and gifts and hospitality.

8.4 Heads of Service are responsible for ensuring their staff understand and comply with the measure which have been put in place to support the implementation of this policy.

8.5 It is the responsibility of individual members of staff to ensure they comply with the requirement to declare the receipt of any gift or hospitality or conflict of interest.

8.6 CDS's internal auditors will periodically monitor the systems of internal control, risk management controls and governance processes which include the adequacy of the anti-bribery and corruption measures.

8.7 Employees and those working for, or on behalf of, CDS are encouraged to contact the Corporate Services Director with any suggestions, comments or feedback that they may have on how our procedures may be improved.

Christina Friedenthal, Corporate Services Director November 2024

Version control

Date	Amendment	Version control
3 August 2012	*Policy approved by Board of Management*	*v.1.0*
November 2022	*Updated and rewritten*	*v.2.0*
November 2024	*Updated and approved by Board*	*v.2.1*