

Anti-Bribery, Corruption and Fraud Policy

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Anti-Bribery, Corruption and Fraud Policy

1.0 Purpose

This anti-bribery, corruption and fraud policy exists to set out the responsibilities of Talented Training Ltd and those who work for us regarding observing and upholding our zero-tolerance position on bribery, corruption, and fraud.

It also exists to function as a source of information and guidance for those working for Talented Training Ltd. It helps them recognise and deal with bribery, corruption, and fraud issues, as well as understand their responsibilities.

Talented Training Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery, corruption and fraud are prevented. Talented Training Ltd has zero tolerance for bribery, corrupt and fraudulent activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

Talented Training Ltd will constantly uphold all laws relating to anti-bribery, corruption, and fraud in all the areas in which we operate. We are bound by the laws of the UK regarding our conduct both at home and abroad.

1.1 Scope

This anti-bribery, corruption and fraud policy applies to all employees (whether temporary, freelance, or permanent), consultants, contractors, learners, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK).

In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery, corruption, and fraud.

2.0 Definitions

Bribery, corruption, and fraud are illegal. Employees must not engage in any form of bribery, corruption, or fraud whether it be directly, passively (as described above), or through a third party (such as an agent or distributor).

2.1 Fraud

Fraud is a general term covering theft, deliberate misuse or misappropriation of assets or anything that leads to a financial advantage to the perpetrator or others upon whose behalf he or she acts, even if these "others" are in ignorance of the fraud. Fraud is in fact

intentional deceit and for this reason it cannot include negligence. Fraud incorporates theft, larceny, embezzlement, fraudulent conversion, false pretenses, forgery, corrupt practices, and falsification of accounts

2.2 Corruption

The term 'corrupt practices' is defined for the purpose of this code as the offering, giving, or accepting of an inducement or reward which may influence the actions taken by the Company, its staff, or governors.

2.3 Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

3.0 What Is and What Is Not Acceptable

This section of the policy refers to 4 areas:

- Gifts and Hospitality.
- Facilitation Payments.
- Political Contributions.
- Charitable Contributions.

3.1 Gifts and Hospitality

Talented Training Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meet the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It follows local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g., a voucher or gift certificate).
- It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the Managing

Director (usually in excess of £100).

- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Managing Director.

Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Managing Director, who will assess the circumstances.

Talented Training Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to the Managing Director. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Managing Director should be sought.

3.2 Facilitation Payments and Kickbacks

Talented Training Ltd does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Talented Training Ltd does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Talented Training Ltd recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your line manager.

3.3 Political Contributions

Talented Training Ltd will not make donations, whether in cash or kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

3.4 Charitable Contributions

Talented Training Ltd accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

Employees must be careful to ensure that charitable contributions are not used to facilitate

and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Managing Director.

4.0 Employee Responsibilities

As an employee of Talented Training Ltd, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery, corruption, and fraud information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery, fraud, and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.

If you have reason to believe or suspect that an instance of bribery, corruption or fraud has occurred or will occur in the future that breaches this policy, you must notify the Managing Director.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Talented Training Ltd has the right to terminate a contractual relationship with an employee if they breach this policy.

5.0 If You Need to Raise a Concern

This section of the policy covers 3 areas:

- How to Raise a Concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

5.1 How to Raise a Concern

If you suspect that there is an instance of bribery, corrupt or fraudulent activities occurring in relation to Talented Training Ltd, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery, corruption, or fraud, you should speak to an appropriate manager.

All employees should use the Whistleblowing Policy to vocalise their concerns swiftly and confidentially.

5.2 What to do if you are a victim of bribery, corruption, or fraud

You must tell your manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the future, or if you have reason to believe that you are a victim of another corrupt or fraudulent activity.

5.3 Protection

If you refuse to accept or offer a bribe or report a concern relating to potential act(s) of bribery, corruption, or fraud Talented Training Ltd understands that you may feel worried about potential repercussions. Talented Training Ltd will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

Talented Training Ltd will ensure that no one suffers any detrimental treatment because of refusing to accept a bribe or other corrupt/fraudulent activities or because they reported a concern relating to potential act(s) of bribery, corruption, or fraud.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you have been subjected to unjust treatment because of a concern or refusal to accept a bribe, you should inform your manager immediately.

6.0 Record Keeping

Talented Training Ltd will keep detailed and accurate financial records and will have appropriate internal controls in place to function as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

7.0 Document Control

Below is the change history and document 'sign off' information.

7.1 Version Control

Record of Amendments		
Version Number	Date of Issue	Detail of Change
V1.0	Apr 2023	Policy Re-write and issue.
V2.0	May 2024	Policy update.
V3.0	May 2025	Policy reviewed and updated – anti-corruption policy and fraud policy merged.

7.2 Next Review Date

The next scheduled review of this document will be May 2026 or earlier if there is a need for an additional review.

7.3 Document Authorisation

Document Authorisation		
Name and Position	Signature	Date
Laura Jambawai Quality and Adult Skills Lead	LJambawai	22 May 2025

