

## Anti-Bribery Policy

Focal Point Training and Consultancy Ltd are committed to providing a high quality and ethically sound service to all its customers. Acting with integrity is one of our core values and an anti-bribery policy is key in supporting that value and upholding our image and reputation.

We are committed to encouraging our business partners and associates to work in the same way.

### **Focal Point:-**

Prohibits the offering, giving, solicitation or acceptance of any bribe, whether cash or other inducement...

- to or from any person or company (public official or private person or company)
- by an individual employee or associate acting on the company's behalf
- in order to gain commercial, contractual or regulatory advantage in a way that is unethical, in order to gain personal advantage for the individual or anyone connected with them

### **Possible Risks**

We believe the markets that Focal Point operates in present low risk of bribery. The biggest area of risk is that of gifts and corporate hospitality. This policy is not meant to prohibit normal and appropriate hospitality practices, such as receipt of gifts, meals or invitations to events or social gatherings, providing they are customary in a particular market, are proportionate and are properly recorded.

### **Guidelines for What is Acceptable**

- Modest/occasional meals with someone with whom we do business
- Occasional attendance at sports, theatre and other cultural events
- Gifts of nominal value, such as pens, or small promotional items

If gifts or invitations which exceed £50 in value are offered, associates and employees should declare it to the Directors.

### **Responsibilities**

- Anyone in the company network operating on behalf of the company has a responsibility to declare gifts as above
- If anyone in the company network suspects an act constitutes bribery, they should refer the matter to the Directors
- The Directors will investigate any suspected incidents of bribery thoroughly
- The Directors will issue this guidance with all contracts for new associates joining the company network

- This guidance will be reviewed by the Directors annually

### **Communicating the Policy**

We ensure that all learners and specifically those enrolling on an ILM programme with us have access to a copy of this policy and the accompanying Internal Quality Assurance Procedure and Complaints Policy (usually as part of their induction). We also ensure that all our associate trainers and support staff have a copy of this policy when they first join our team.

### **Reviewing the Policy**

This policy will be monitored and reviewed annually.