

City Gateway

Anti-Bribery Policy

Reviewed by (name)	Date	Next review needed
Diane Betts	February 2022	February 2023
Diane Betts	February 2023	December 2023

This policy will be reviewed on an annual basis

Anti-Bribery Policy

City Gateway is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines City Gateway's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. City Gateway will not tolerate any form of bribery by its employees, agents or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

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

City Gateway 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 may be issued from time to time by City Gateway.

This policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees on behalf of City Gateway; and
- the consequences of any breaches of this policy.

Under the Bribery Act 2010, a bribe is a financial or other type of reward or 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.

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 City Gateway 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.

A criminal offence will be committed if:

- an employee acting on behalf of City Gateway offers, promises, gives, requests, receives, or agrees to receive bribes; or
- an employee acting on behalf of City Gateway offers, promises or gives a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties; and
- City Gateway does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

What is prohibited?

City Gateway prohibits employees from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or City Gateway, whether a public or government official, official of a state-controlled industry, political party or a private person or City Gateway, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or City Gateway 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 City Gateway in either obtaining or maintaining City Gateway business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

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 contractors, joint-venture partners, customers, suppliers or other third parties.

Steps to prevent Bribery

City Gateway will take the following steps to assist in the prevention of bribery:

- Risk assessment: Effective risk assessment lies at the very core of the success of this policy. All staff must assess the vulnerability of their activities. Risk identification pinpoints the specific areas in which we face bribery and corruption risks and allows us to better evaluate and mitigate these risks and thereby protect ourselves.
- Accurate books and record-keeping: Many serious bribery offences have been found to involve some degree of inaccurate record-keeping. Accurate records and financial reporting must be maintained for all activities and for all third-party representatives acting on our behalf. False, misleading or inaccurate records of any kind could potentially damage the reputation of City Gateway.
- Effective monitoring and internal control: Effective systems of monitoring and control are essential in all organisations and City Gateway is no exception. Once bribery risks have been identified and highlighted through the risk assessment process, we may need to amend procedures to help mitigate these risks on an on-going basis.
- Standard clauses in contracts: City Gateway includes a standard anti-bribery clause in all relevant contracts to reflect its zero-tolerance approach to bribery in the conduct of its business.
- Training: City Gateway provides training in the form of an online Anti-Bribery module and an online Anti-Bribery refresher module which is mandatory for all staff identified as being of higher risk in relation to bribery. This includes all members of SLT and the Board of Trustees.

City Gateway Records

Employees are required to take particular care to ensure that all City Gateway records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with customers, suppliers and public officials.

Corporate entertainment, gifts and hospitality

City Gateway permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of City Gateway; or
- to present City Gateway's services effectively;

provided that it is:

- arranged in good faith, and
- not offered, promised or accepted to secure an advantage for City Gateway or any of its employees or associated persons or to influence the impartiality of the recipient.

City Gateway will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

Procedure

Employees should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to their manager.

Employees are required to set out:

- the objective of the proposed customer entertainment or expenditure;
- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

Any gifts, rewards or entertainment received or offered from customers, suppliers or other business contacts should be reported immediately to your manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees may be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest.

If an employee or associated person wishes to provide gifts to suppliers, customers or other business contacts, prior written approval from the CEO is required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in limited circumstances and will be subject to a cap of £50 per recipient.

Employees and, where applicable, associated persons must supply records and receipts, in accordance with City Gateway's expenses policy.

This policy does not prohibit:

- normal and appropriate hospitality and entertainment with customers (please see City Gateway's expenses policy); and
- the use of any recognised fast-track process that is publicly available on payment of a fee.
- Any such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.
- As a general rule, small tokens of appreciation, such as flowers or a bottle of wine, may be retained by employees.
- Reporting suspected bribery

City Gateway depends on its employees to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees are requested to assist City Gateway and to remain vigilant in preventing, detecting and reporting bribery.

Employees are encouraged to report any concerns that they may have to the CEO as soon as possible. Any such reports will be thoroughly and promptly investigated in the strictest confidence. Employees will be required to assist in any investigation into possible or suspected bribery. 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 customers or government officials.

Employees will also be required to comply with City Gateway's whistleblowing policy. Employees who report instances of bribery in good faith will be supported by City Gateway. City Gateway will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the CEO.

We will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out.

We will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. City Gateway may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, City Gateway who are found to have breached this policy.

We may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police.

We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

We reserve the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.