

Kate's Training CIC

Bribery and Corruption Policy

At Kate's Training CIC we are committed to conducting our business with integrity and in accordance with all applicable laws and regulations. This includes the UK Bribery Act 2010. This policy applies to our trainers, directors, secretary, staff, contractors and business partners and anyone else who works with us or joins our services. This policy outlines zero-tolerance approach to bribery and corruption and it sets out the responsibility to us and everyone involved with our services.

1. Definition

Bribery is offering, promising, giving, accepting, or soliciting any advantage with the aim of influencing the actions of another party.

2. Policy Statement

- **1.1.** Kate's Training CIC prohibits any form of bribery or corruption, whether direct or indirect, by or on behalf of the company.
- **1.2.** Trainers, Directors, Employees, Volunteers and associated persons must not engage in any form of bribery, whether with government officials, business partners, customers, or any other individual or entity.

3. Scope

This policy applies to all employees, directors, officers, contractors, consultants, agents, and any other persons associated with Kate's Training CIC.

4. Compliance with the Law

- **4.1** The Bribery Act 2010 is the UK legislation that governs bribery and corruption offenses. We require all directors, secretary, trainers, employees to comply with this law and any other relevant anti-bribery and corruption laws applicable in the jurisdictions where we operate.
- **4.2** Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contractual relationship and may also result in criminal prosecution for individuals involved.

5. Prohibited Conduct

- **5.1** Bribery: Offering, promising, giving, accepting, or soliciting any form of advantage, whether cash or non-monetary, to improperly influence business decisions or gain any business advantage.
- **5.2** Facilitation Payments: Small payments made to expedite routine government actions or services are also prohibited.
- **5.3** Gifts and Hospitality: Gifts, hospitality, or entertainment must be modest, appropriate, and comply with our Gifts and Hospitality Policy. They should not be given or received with the intention of influencing business decisions improperly.

Kate's Training CIC is a community interest company limited by guarantee and registered in England and Wales (Registration number 15816406).



6. Gifts and Hospitality

Trainers, directors, employees and everyone within our services must obtain prior approval before offering or accepting any gifts, hospitality, or entertainment beyond modest and reasonable levels. Approval must be sought from the CEO or one of the Directors/ Trustees.

7. Reporting Suspected Bribery or Corruption

- 7.1 All employees and associated persons have a duty to report any suspected bribery or corruption promptly. Reports should be made to CEO or one of Directors/Trustees via email support@katestraining.uk or phone 01617062276 or 07362512257.
- **7.2** Kate's Training CIC will protect whistleblowers who report in good faith from retaliation or reprisal. Please ask for **Whistleblowing Policy**.

8. Training and Awareness

Our Directors/Trustees will undertake training on this policy and the requirements of the Bribery Act 2010 to all employees and associated persons of the public and provide all information to our trainers and business partners, including contractors.

7. Policy review

This policy should be read alongside our other organisational policies.

This policy will be reviewed annually and as and when required.

Last review: 09/05/2025

Policy Team: Kate Gorski, Piko Choi, Katherine Metcalfe.