



ANTI-CORRUPTION AND BRIBERY POLICY

Title	Anti-Corruption and Bribery Policy
Version	1.1 Jul 2026
Owner	Director
Validity	Sudbrook Community
Next review	July 2027 or earlier if there is a significant change in legislation

Introduction

Under section 7 of The Bribery Act 2010, a commercial organization would commit an offence by failing to prevent employees or other individuals associated with them from committing bribery on the organization's behalf. The Act covers all companies incorporated or formed in the UK or those that carry out business in the UK.

Bribery is defined as giving, offering or taking a reward, service or any other item of value as a means of influencing actions and/or in breach of the law. Corruption means illegal, immoral or dishonest behavior.

Under the Bribery Act 2010, it is an offence to:

- Bribe another person directly or through a third-party including offering or promising financial or another advantage with the intention of getting a reward in return for such activity.
- Request, accept or receive a bribe.
- Bribe a foreign public official.
- Not preventing bribery by a commercial organization (by its employees or other individuals associated with it).

The Policy covers all Individuals and/or businesses associated with Sudbrook Kinderhaus including staff, parents and/or legal guardians, volunteers, contractors, suppliers and other third-party service providers. Staff cover all personnel including permanent, temporary, agency staff and contractors regardless of their position, roles or responsibilities, and irrespective of their employment status.

Purpose and Scope

The purpose of the policy is to provide clear guidelines. Sudbrook Kinderhaus is committed to being fair and honest in all its dealings and adopts a zero-tolerance approach towards bribery.

Sudbrook Kinderhaus expects all individuals and businesses to act with integrity and without bribery and/or corruption. Sudbrook Kinderhaus shall include clauses to this effect in relevant contracts.

This policy is to be read alongside the Code of Conduct and is available on the staff and the website. Any breach of its regulations will be considered a disciplinary matter under Sudbrook Kinderhaus' disciplinary policy.

Guidelines

Based on the principles of the Act, Sudbrook Kinderhaus shall:

- Establish a code of conduct dealing with key risk areas including gifts, corporate hospitality, facilitation payments, political and charitable donations, sponsorships and other related activities.
- Apply due diligence procedure which would include conducting investigation or research, monitoring persons associated with Sudbrook Kinderhaus close monitoring of the recruitment process and following up on business reference.
- Establish stringent financial controls including multiple authorizations for significant transactions and close monitoring of hospitality and promotional expenses, charitable and political donations.

Procedure

- The Director is the Compliance Officer and responsible for Sudbrook Kinderhaus Anti-Corruption and Bribery Policy the Director. Staff must contact the Compliance Officer for any queries.
- The level of risk will depend on the circumstances of Sudbrook Kinderhaus and the country where Sudbrook Kinderhaus and persons associated with Sudbrook Kinderhaus are based. For example, offers of rebate or incentive to use services of recruitment, HR or other service providers could constitute a bribe.
- Where an employee believes that they have been offered a bribe by a third party or if asked to make one, suspects that this may happen in the future, or that they believe they are a victim of another form of unlawful activity, this must be reported immediately to the Compliance Officer.
- For the avoidance of doubt, this includes reporting the employee's own wrongdoing. The duty to prevent, detect and report any incident of bribery and any potential risks rests not only with the Compliance Officer but also equally with all employees and associated persons.
- When an employee believes that an offence has been committed that relates to bribery or corruption, the employee can also raise it through Sudbrook Kinderhaus' Whistleblowing Policy.
- Individuals associated with Sudbrook Kinderhaus who wish to report an act of bribery must immediately contact the Compliance Officer directly. Should they believe that it may be beyond the scope of Sudbrook Kinderhaus, they must report to the relevant legislative body.
- Where any incident of alleged bribery or corruption has been reported, it will be investigated thoroughly and dealt with through Sudbrook Kinderhaus' disciplinary procedure.
- Confidential and/or sensitive information pertaining Sudbrook Kinderhaus must not be disclosed to a third party, either during or after the employment has ended. This includes information on Sudbrook Kinderhaus present or potential customers or suppliers and any information relating to the business.
- Acts of bribery or corruption will be treated as gross misconduct and could lead to summary dismissal.

Gifts and Corporate Hospitality

Gifts and hospitality include the receipt or offer of gifts, meals, other forms of appreciation and gratitude, invitations to events or other social gatherings, in connection with matters related to Sudbrook Kinderhaus business. Receipt of any such gift or corporate hospitality above the defined £60 per school year limit is unacceptable and must be reported to the Compliance Officer. For the avoidance of doubt, this includes any collective gifts from donors, e.g. parents that are above the £60 value limit.

The following situations are unacceptable and will be classified as a bribe:

- 'Quid pro quo' service (offer for something in return)
- Gifts in the form of cash
- Entertainment of a sexual or similarly inappropriate nature
- Spending more than £30 per head on Third-Party entertainment has to be authorized by the

Director

- Not reporting any gift that is of value over £60
- Receiving personal discounts or other benefits from suppliers or clients or third parties

All employees have a responsibility to raise any concerns relating to bribery or corruption and to ensure they are acting in good faith to protect the interests and reputation of Sudbrook Kinderhaus at all times.

Facilitation Payments, Commission Payments and Donations

Facilitation payments are small level payments, usually made to a government official, to facilitate a routine action or process, for example, obtaining a permit. Under the Act, facilitation payments are illegal. Sudbrook Kinderhaus does not condone such payments.

Commission payments pre-authorized by the Director made in return for services are acceptable if they are not significantly disproportionate to the value of the service. Sudbrook Kinderhaus shall maintain accurate records of any such payments along with an explanation of how the rates are calculated.

Before making any charitable or political donations or sponsorship agreements, Sudbrook Kinderhaus shall carry out relevant checks including verifying bank accounts, to ensure legitimacy of the transaction.

Any kind of solicitation or request for solicitation must be reported to the Compliance Officer.

Implementation, Monitoring and Record keeping

The implementation of this policy will be reviewed annually in respect of its suitability, adequacy, effectiveness, and to make improvements as appropriate.