

## **Bribery Act (2010) Policy**

At Acuity, we are committed to conducting our business in an honest and ethical manner. We require all staff, including staff, contractors, and those working in partner agencies, to act with integrity and transparency at all times. This commitment extends to safeguarding the company's resources, reputation, and relationships, and ensuring compliance with the UK Bribery Act 2010 and associated guidance.

We have zero tolerance for bribery and corruption in any form, whether direct or indirect, and we expect the same high standards from everyone representing Acuity. To this end, our procedures stipulate that it is unacceptable to engage in the following activities:

**1. Offering Bribes:**

Giving, promising to give, or offering a payment, gift, or other benefit with the expectation or hope that it will result in a business advantage or influence a business decision.

**2. Bribery of Officials:**

Giving, promising to give, or offering a payment or gift to a national or local government official, agent, or representative to "facilitate" or expedite a routine procedure (commonly known as a facilitation payment).

**3. Accepting Bribes:**

Accepting payment, gift, or benefit from a third party that is offered with the expectation or intention of obtaining a business advantage for them or their organisation.

**4. Engaging in Corrupt Practices:**

Participating in any other activity that breaches this policy, including indirect involvement in corrupt practices through third parties.

### Our Commitment to Compliance

To ensure compliance with the Bribery Act 2010, Acuity has established procedures to prevent, detect, and address bribery and corruption risks. These procedures are informed by the updated guidance, "Adequate Procedures: Guidance to the UK Bribery Act 2010" (Transparency International UK, 2023), which provides best practices for organisations in maintaining robust anti-bribery systems.

As part of our commitment, Acuity will:

- **Educate and Train Staff:** Provide regular training to ensure that all staff understand the risks of bribery and corruption, the requirements of this policy, and their individual responsibilities.
- **Implement and Monitor Controls:** Maintain internal controls, record-keeping systems, and auditing processes to detect and prevent bribery and corruption.
- **Promote Transparency:** Ensure that all business dealings are transparent and documented, including relationships with third parties, contractors, and agents.
- **Encourage Reporting:** Foster an environment where staff can report concerns



about potential bribery or corruption without fear of retaliation, using confidential and secure reporting channels.

### Consequences of Non-Compliance

Breaches of this policy are treated with the utmost seriousness and may result in disciplinary action, including termination of employment or contracts. In addition, any violations that contravene the Bribery Act 2010 may result in significant legal consequences, including fines, imprisonment, or other penalties.

### Responsibilities

All individuals working for or on behalf of Acuity have a responsibility to:

- Familiarise themselves with this policy and the relevant sections of the Bribery Act 2010.
- Avoid any activity that might lead to or suggest a breach of this policy.
- Promptly report any concerns, suspicions, or knowledge of potential bribery or corruption.

The responsibility for monitoring and enforcing compliance with this policy lies with the Executive Management Team. They will review and update this policy periodically to reflect changes in legislation, regulatory requirements, or best practices.

### Resources and Guidance

For more information on the Bribery Act 2010 and the latest guidance, please refer to:

- The Bribery Act 2010: <https://www.legislation.gov.uk/ukpga/2010/23/contents>
- Adequate Procedures: Guidance to the UK Bribery Act 2010 (Transparency International UK, 2023): <https://www.transparency.org.uk>

By adhering to this policy, Acuity demonstrates its commitment to ethical business practices and compliance with the highest standards of integrity.

Signed by: Denise Raine, Director

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