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Anti-Bribery & Anti-Corruption Policy

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Document title	Anti-Bribery & Anti-Corruption Policy
Version	4.0
Approved by (Oversight committee)	GBS Board of Directors
Policy lead (Staff member accountable)	Head of HR
Date of original approval	February 2022
Date of last review	July 2025
Changes made at the last review	Updated to reflect best practice policy
Date effective from	July 2025
Date of next review	August 2027

Related GBS policies

- GBS Data Protection Policy
- GBS Whistleblowing Policy
- GBS Staff Disciplinary Policy
- GBS Staff Grievance Policy
- GBS Student Complaints Policy and Procedure
- GBS Student Referral Policy
- GBS Equality and Diversity Policy
- GBS Student Protection Plan
- GBS Anti-Harassment and Anti-Bullying Policy

External Reference Points

1. Bribery Act Guidance published by the Ministry of Justice (<http://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>)
2. The Chartered Institute of Purchasing and Supply (CIPS) Corporate Code of Ethics (<https://www.cips.org/employers/ethical-services/corporate-code-of-ethics/>)
3. Serious Fraud Office (SFO) (<https://www.sfo.gov.uk/>)

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1. Policy Statement

- 1.1. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealing and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 1.2. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

2. Purpose

2.1 The purpose of this policy is to:

- a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

2.2 The Bribery Act 2010 is important to all colleagues because if a colleague is deemed to be guilty of an offence under the Act it could lead to summary dismissal for gross misconduct. Furthermore, bribery and corruption are punishable for individuals by up to ten years' imprisonment. If the Company is found to have taken part in corruption, we could face an unlimited fine and face damage to our reputation. We therefore take our legal responsibilities very seriously.

2.3 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential students, clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3. Who is covered by the policy?

3.1 Outline of the act

The Act creates four new offences as follows:

1. Bribing another person
2. Receiving a bribe
3. Bribing a foreign public official
4. Failure of a commercial organisation to prevent bribery

The main offences for colleagues to be aware of are bribing another person and receiving a bribe.

3.2 This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, colleagues (whether permanent, fixed-term or temporary), consultants, contractors, apprentices, seconded staff, casual staff and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their colleagues, wherever located (collectively referred to as **staff** in this policy). Therefore, colleagues also need to ensure that a third party is not offering or receiving bribes whilst undertaking work under our instruction for a client.

4. What is bribery?

4.1 A bribe can take many forms but essentially a bribe is where a colleague offers, promises or gives another organisation, employee of another Company, person or fellow staff member a gift, favour or financial advantage in order to bring about the improper performance of their duties which could result in a commercial or personal advantage. For example, to entice or encourage the individual to make a decision they may not have made were it not for the bribe. To summarise if you intend to dishonestly persuade someone to help you achieve something, this will constitute a bribe.

4.2 The following could constitute a bribe:

- Money
- Gifts
- Favours
- Corporate Hospitality

5. Gifts and Hospitality

5.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

5.2 The giving or receipt of gifts is not prohibited, if the following requirements are met:

- a) it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or explicit or implicit exchange for favours or benefits;
- b) it complies with local law;
- c) it is given in our name, not in your name;
- d) it does not include cash or a cash equivalent (such as gift certificates or vouchers);

- e) it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- f) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- g) it is given openly, not secretly; and
- h) gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without prior approval of the Compliance Manager, currently the Governance Officer.

5.3 There may be 'closed periods' throughout the year when colleagues will not be able to give and/or receive gifts or hospitality from particular clients or suppliers. Closed periods may be introduced before or after large contracts are to be signed and will be announced to colleagues by the Company in advance.

5.4 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

5.5 Senior Managers will also be required to log and monitor all material gifts and hospitality that are either given or received by colleagues in their department to ensure they adhere to these policy guidelines. The Compliance Manager will conduct regular reviews of all such logs and draw any matters of concern to the Board.

6. What is not acceptable

6.1 It is not acceptable for you (or someone on your behalf) to:

- a) give, promise to give, or offer, a payment, gift or hospitality with the expectation of hope that a business advantage will be received, or to reward a business advantage already given;
- b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- c) accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f) engage in any activity that might lead to a breach of this policy.

7. Facilitation Payments and Kickbacks

7.1 We do not make, and will not accept, facilitation payments or “kickbacks” of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.

7.2 If you are asked to make a payment on Global Banking School’s behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Compliance Manager.

7.3 Kickbacks are typically payments made in return for a business favour or advantage. All staff must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

8. Donations

8.1 We do not make contributions to political parties.

8.2 We only make charitable donations that are legal and ethical under local laws and practices.

8.3 No donation must be offered or made without the prior approval of the Compliance Manager or a member of the Senior Management Team.

9. Your Responsibilities

9.1 You must ensure that you read, understand and comply with this policy.

9.2 Those colleagues responsible for negotiating supplier or client contracts must always ensure that they negotiate the contract in a way that is in the best interests of Global Banking School and not for any personal gain.

9.3 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

9.4 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the Annex.

9.5 Any colleague who breaches this policy will face disciplinary action, which could result in summary dismissal for gross misconduct.

10. Gift / Corporate Hospitality: Record-Keeping

10.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

10.2 All expense forms and credit card statements must clearly identify where any gift or corporate hospitality has been given and who was the recipient. Where any gift or hospitality is of a high value it should be accompanied by an explanation of why such expenditure was considered necessary to enable the senior manager or director to be able to approve this expenditure. If any expenditure on gift or hospitality is considered excessive or inappropriate it will not be reimbursed by the company and may result in disciplinary action as being contrary to this policy.

10.3 As a colleague if you do not adhere to the authorisation process you may face disciplinary action, up to and including summary dismissal, depending on the circumstances.

10.4 You must declare and keep a written record of all material hospitality or gifts accepted or offered using the Declaration of Gifts and Hospitality Form, which will be subject to review.

10.5 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. Attaching the authorisation form where necessary.

10.6 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness.

10.7 No accounts must be kept "off-book" to facilitate or conceal improper payments.

11. How to raise a concern

- 11.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager or the Compliance Manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of our Whistleblowing Policy can be found on the company [intranet](#).

12. What to do if you are a victim of bribery or corruption

- 12.1 It is important that you tell the Compliance Manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

13. Protection

- 13.1 Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 13.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance manager immediately. If the matter is not remedied, and you are a colleague, you should raise it formally using our Grievance Procedure, which can be found on the company [intranet](#).

14. Training and Communication

- 14.1 Training on this policy forms part of the induction process for all new staff. All existing staff will receive regular, relevant training on how to implement and adhere to this policy.
- 14.2 Our zero-tolerance approach to bribery and corruption should be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

15. Who is responsible for the policy?

15.1 The Senior Management Team has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

15.2 The Compliance Manager, currently the Governance Officer, has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

16. Monitoring and Review

16.1 The Compliance Manager will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. This assessment should be based on a regular review of the external and internal risks the company has to bribery and corruption. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular review to provide assurance that they are effective in countering bribery and corruption.

16.2 All colleagues are responsible for ensure that they adhere to the requirements of this policy and report any suspicions to their line manager immediately.

16.3 Staff members are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Compliance Manager.

16.4 This policy does not form part of any colleague's contract of employment and it may be amended at any time.

17. Policy Amendment and Administration

17.1 This policy may be amended by GBS at any time. If there are any queries relating to policy administration, please contact the Governance Office at governance@globalbanking.ac.uk.

18. Data Protection and Confidentiality

18.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioner's website](#). GBS as a Data Controller implements appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

19. Alternative Format

19.1 This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Governance Office at governance@globalbanking.ac.uk.

Annex 1

Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for Global Banking School and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager or to the Compliance Manager:

- a. you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- b. you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- c. a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- d. a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- e. a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- f. a third party requests an unexpected additional fee or commission to "facilitate" a service;
- g. a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- h. a third party requests that a payment is made to "overlook" potential legal violations;
- i. a third party requests that you provide employment or some other advantage to a friend or relative;
- j. you receive an invoice from a third party that appears to be non-standard or customised;
- k. a third party insists on the use of side letters or refuses to put terms agreed in writing;
- l. you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- m. a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- n. you are offered an unusually generous gift or offered lavish hospitality by a third party.