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# ANTI-BRIBERY AND CORRUPTION POLICY

Version Number	Date	Purpose of Change	Classification	Sign Off
V4.1	09/10/2025	Merge of EPA and Awarding policy new content and formatting	Public	Lesley Barr

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# 1. SCOPE

1.1. The purpose of this policy is to establish robust controls to ensure compliance with all applicable anti-bribery and corruption laws and regulations, and to ensure that Smart Awards conducts its business ethically, transparently, and in a socially responsible manner.

1.2. Smart Awards is committed to maintaining the highest standards of integrity and business ethics. Our customers, investors, suppliers, employees, and other stakeholders must have confidence that Smart Awards operates fairly, lawfully, and honestly.

1.3. According to Transparency International, corruption is “the abuse of entrusted power for private gain.” Corruption undermines fair competition, distorts markets, erodes trust, and damages reputations. It can also expose both organisations and individuals to serious criminal and financial penalties.

1.4. Smart Awards is owned by the Hexatronic Group, which operates a strict zero-tolerance policy toward all forms of bribery and corruption.

1.5. This policy supports compliance with the Smart Awards and Hexatronic Group zero-tolerance approach. It provides clear guidance on acceptable and unacceptable conduct when giving or receiving benefits—such as gifts, meals, entertainment, hospitality, travel, study visits, training, conferences, or promotional events—as well as on managing conflicts of interest and appointing intermediaries.

# 2. RESPONSIBILITIES

2.1. This policy applies to all individuals involved in the development, delivery, and quality assurance of Smart Awards qualifications and business operations.

2.2. Smart Awards holds overall responsibility for ensuring compliance with this policy and all legal and ethical obligations. The COO has day-to-day responsibility for its implementation, monitoring, and effectiveness.

2.3. The prevention, detection, and reporting of bribery and corruption is the responsibility of every individual working for or on behalf of Smart Awards. Employees and contractors must avoid any activity that might lead to, or suggest, a breach of this policy. Any concerns must be reported immediately to the COO.

2.4. Breaches of this policy will be treated seriously. Any employee or representative found to have violated this policy will be subject to disciplinary action, up to and including dismissal for gross misconduct. Smart Awards also reserves the right to terminate contracts with any third party found to be in breach.

2.5. Managers may issue supplementary local guidance for approving benefits in line with this policy. However, such local rules must not weaken or contradict the principles set out here.

# 3. DEFINITIONS

3.1. Benefit: Any item or service of tangible or intangible value provided to an individual. Examples include gifts, meals, entertainment, cash, vouchers, goods, discounts, trips, loans, tickets, sponsorships, commissions, employment opportunities, or awards.

3.2. Bribe: The offering, giving, receiving, or soliciting of an undue advantage as an inducement or reward for improper performance of a function or activity. Both giving and receiving a bribe are criminal offences.

3.3. Facilitation Payment: A payment made to a public official to expedite a routine process. Such payments are strictly prohibited.

3.4. Conflict of Interest: A situation where personal interests (financial, family, or otherwise) could improperly influence, or appear to influence, professional judgment or actions.

3.5. Intermediary: Any person or organisation engaged by Smart Awards or the Hexatronic Group to represent their interests (e.g., agents, consultants, brokers, or representatives).

3.6. Qualification Assessments: Objective evaluations of learner competence. Any attempt to influence results through bribery or undue influence is strictly forbidden and will result in disciplinary and/or legal action.

## 4. OUR COMMITMENT

4.1. We are committed to implementing effective measures to prevent bribery and corruption within Smart Awards.

4.2. Smart Awards is committed to:

- Conducting **regular risk assessments** to identify and manage bribery and corruption risks.
- Providing **training and awareness** to employees and contractors on anti-bribery laws and responsibilities.
- Implementing **due diligence** procedures for suppliers, contractors, and partners.
- Promoting a **culture of transparency**, encouraging reporting of concerns without fear of retaliation.
- Investigating all reports of potential bribery or corruption promptly and fairly.

## 5. POLICY STATEMENT

5.1. Smart Awards maintains a zero-tolerance approach to bribery and corruption. All business activities must be conducted honestly, ethically, and in compliance with the UK Bribery Act 2010 and all other relevant legislation.

5.2. Individuals and the organisation may face severe penalties for engaging in bribery or corruption, including imprisonment, unlimited fines, and exclusion from public tenders.

5.3. 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, in respect of our conduct.

5.4. Bribery and corruption are punishable for individuals by imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

5.5. Bribes: Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory or personal advantage. All who work for or on behalf of Smart Awards must not engage in any form of bribery, either directly or through any third party.

5.6. Benefits may be given and received if they are moderate and given openly. All benefits, whether received or given, must be agreed to by the MD of Smart Awards.

5.7. Gifts must not exceed the stipulated value for each country. For gifts given or received multiple times, the value must be added up over 6 months. If an individual gift or the total value of multiple gifts within half a year exceeds the stipulated value, the gift may not be given or received. If, however, it can legitimately be assumed that declining a gift from a foreign donor will seriously damage the business relationship due to cultural reasons, the gift may still be received and accepted as received on behalf of Smart Awards, but the immediate manager must be informed straight away. The received gift will be dealt with by Smart Awards.

5.8. Benefits without economic value can also constitute a gift. This might, for example, be membership of an exclusive club or a prestigious award.

5.9. Meals and entertainment are given to create and maintain good business relations. They must have a commercial relevance and mainly be used for work purposes, such as working lunches.

5.10. Invitations to meals and entertainment may only be given or accepted if they are for a normal meal and/or if the entertainment is modest. If in doubt, consult your immediate manager before accepting an invitation. Meals and entertainment related to business negotiations, except for customary work meals, should be avoided.

5.11. Multiple invitations to or from a business contact over short periods of time should be avoided.

5.12. Invitations issued to the employee's or business contact's spouse/partner or another relative or related party are of special significance when assessing whether or not a benefit is permitted. The general rule, therefore, is that relatives may not attend. Exceptions to this rule may be granted by the immediate manager, who must take a very restrictive approach when assessing the situation.

5.13. Trips, study visits, training, conferences and promotional events are permitted if they play a natural and useful role in fulfilling work duties. One basic prerequisite is that the content is professional and that there is a set programme that is specified in the invitation.

5.14. The work element of the trip must be predominant and there must only be limited scope for entertainment and leisure.

5.15. Trips, study visits, training, conferences and promotional events related to business negotiations, except for customary events, should be avoided.

5.16. It is not permitted to accept invitations made to an employee's spouse/partner or another relative or related party. Nor is it permitted to invite a business contact's spouse/partner or another relative or related party. The recipient must pay for travel and accommodation.

5.17. Non-permitted benefits. The following benefits may never be received or given, irrespective of the recipient, because, by their very nature, they affect behavior:

- a) monetary gifts and loans of money,
- b) goods that exceed the stipulated value,
- c) services for private purposes and personal discounts on goods and services,
- d) the right to use a vehicle, boat, holiday home or similar for private use,
- e) pleasure trips or holiday trips,
- f) purchases of sexual services or visits to strip or porn clubs, and
- g) benefits that may give the donor a hold over the recipient.

5.18. Facilitation payments. Smart Awards does not permit facilitation payments, i.e. payments made to speed up routine procedures carried out by officials. If an employee is asked to make a facilitation payment, they must report this to their immediate manager and provide a description of the circumstances under which the payment was requested. The manager must then immediately

report the request for a facilitation payment to the MD of Smart Awards.

5.19. Benefits may not be given or received if they are being given, or suspected of being given, with the aim of influencing the recipient's behavior or decision.

5.20. Benefits may never be given or received if they are linked with terms regarding a particular course of action for the recipient.

5.21. Business contacts with people with whom an employee has a personal friendship should be avoided and/or considered carefully.

5.22. Gifts, invitations to meals and entertainment, trips, study visits, training, conferences and promotional events may never be given to a person who exercises public authority or decides on a public procurement. In addition, a very restrictive approach must be applied to gifts to employees or contractors: a) At public bodies, even if the employee or contractor does not exercise public authority or take part in public procurement. b) In privacy sensitive operations where special protective interests apply, such as publicly owned or financed companies, privately owned banks, finance and insurance companies, and companies in the fields of certification and supervisory activities.

5.23. If in doubt about whether a benefit is permitted. Employees must report any benefits that risk breaching these guidelines to their immediate manager for an assessment of whether or not the benefit may be received. If in doubt about whether or not a benefit is permitted, raise the issue with your immediate manager. If there is still doubt surrounding the benefit, it should not be given or received.

5.24. Conflicts of interest. The decisions we make within the Smart Awards and the Hexatronic Group must be taken in the best interests of Smart Awards and the Group and not be based on individual considerations or relationships.

5.25. A conflict of interest arises when something impedes or influences our independent judgement to the detriment of Smart Awards. We must avoid situations where our personal interests could conflict with, or even appear to conflict with, the Smart Awards and the Group's interests.

5.26. See below for examples of areas that could result in a conflict of interest and what applies in that situation:

- Business opportunities/personal gain. As an employee, you may never exploit a business opportunity for your own personal gain if that opportunity has been identified in your work for Smart Awards and is in conflict with Smart Awards interests. Nor may you use Smart Awards property or information, or your position at Smart Awards, in any other way for personal gain.
- Other employment. You may not accept employment outside of Smart Awards – whether paid or unpaid– that adversely affects or could adversely affect your work for Smart Awards or that creates or could create a conflict of interest.
- Nor may you engage in business activities outside of Smart Awards that draw time and attention from your commitments towards Smart Awards or require you to work during your working hours at Smart Awards. If, nonetheless, an employee holds a position with another employer or runs their own business, a written agreement should be in place between Smart Awards and the employee.
- External assignments Smart Awards employees may not accept Board assignments, or similar assignments, for a profit-making company or government authority if it creates a conflict of interest. All such assignments must be approved in advance by your manager. Board assignments for non-profit-making or civil society organizations do not require approval in advance, provided there is no potential conflict of interest with Smart Awards.
- Political activities Smart Awards does not make any donations or provide any other support,

either directly or indirectly, to political parties, political organizations or individual politicians. You may not make any political donations on behalf of Smart Awards or using the company's funds or resources.

5.27. Intermediaries. If we deem there to be a genuine need for an intermediary for a particular business transaction, they must be chosen with care. If an intermediary acts unlawfully, this could cause significant damage to our brand and also, in the longer term, entail a risk of legal penalties.

5.28. Charitable and Political Contributions: We do not make donations, whether in cash or kind, in support of any political parties or learners, as this can be perceived as an attempt to gain an improper business advantage. Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of Smart Awards. All charitable contributions should be publicly disclosed.

## 6. PROCEDURE

6.1. If an employee becomes aware of a breach of these guidelines, they must report the breach to their immediate manager or their manager's manager. Smart Awards has a whistleblower service for reporting serious breaches anonymously. Individuals involved in corruption may be the subject of criminal penalties such as fines or imprisonment, as well as disciplinary action such as dismissal.

6.2. How to raise a concern: 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 or concerns, these should be raised with Smart Awards.

6.3. What to do if you are a victim of bribery or corruption: It is important that you tell Smart Awards 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.

6.4. Protection: Individuals 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.

6.5. 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.

6.6. If you believe that you have suffered any such treatment, you should inform Smart Awards. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

6.7. Our zero-tolerance approach to bribery and corruption is communicated to all employees suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

6.8. Record keeping: Smart Awards keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties. Employees must

declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. Employees 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.

## 7. REPORTING CHANNELS

Concerns can be reported through any of the following channels:

- a. **Immediate Line Manager or Supervisor**
  - o First point of contact for employees who feel comfortable discussing the issue openly.
- b. **Chief Executive (CEO)**
  - o If the concern involves a manager or senior staff member, or you prefer to escalate directly.
- c. **Whistleblowing Service (Anonymous Reporting)**
  - o For serious or sensitive issues where anonymity is desired.
  - o Accessible via the Smart Awards website or dedicated reporting link/email.

## 8. RISKS

8.1. A risk assessment must be carried out when hiring an intermediary, such as an agent, consultant, representative, broker or business intermediary. The risk assessment entails gathering facts about the intermediary and the business transaction with the aim of assessing the intermediary's underlying interests and the risk of the intermediary acting corruptly.

8.2. The risk that the intermediary poses from a corruption perspective is pivotal in the level of checks carried out for an intermediary.

8.3. Important risk factors to consider are: Country risks: is the intermediary active or registered in a country that is exposed to corruption, or a country with strict banking secrecy or impenetrable tax accounting systems. Industry risk: sales to industries characterised by a high degree of public procurement, permit requirements or frequent contact with authorities in order to operate are generally more exposed to risk. Contract price, type of contract and structure of compensation: these can all be risk factors.

## 9. REVIEW OF THIS POLICY

9.1. Smart Awards will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

9.2. This policy is reviewed and revised annually in response to feedback, changes in legislation and guidance from the regulators.

## 10. PROCESS FOR RAISING ISSUE

Process Step Description	Process	Person Responsibility	Responsibility
Identify and Report	Process	Individual or company	Report suspected bribery, corruption, or facilitation payment as soon as possible through one of the reporting channels

Acknowledge Receipt	Process	COO	Confirm receipt of the report within five (5) working days, maintaining confidentiality.
Preliminary Assessment	Process	COO	Review the nature of the allegation and determine if a full investigation is required.
Investigation	Process	COO	Conduct a fair, confidential, and evidence-based investigation. Collect statements, documentation, and relevant evidence.
Findings and Action	Decision	COO	Conclude whether a breach has occurred and recommend corrective or disciplinary actions.
Mitigate risk	Decision	Responsible Officer	Add to risk register and mitigate risks
Report to regulators if required	Process	Responsible Officer	Raise an event notification via Ofqual Portal
Communicate outcomes to other stakeholders	Process	COO	Where possible and appropriate, provide feedback to the individual who raised the concern.
Lessons learned	Process	COO	Evaluate lessons learned and update policy, training, or controls as needed.
Review and Closure	End	COO	Close and archive

## 11. OFQUAL GENERAL CONDITIONS

PR1.1 An awarding organisation must conduct its activities in a way that is designed to facilitate its adherence to the following principles:

- (a) Principle 1 – An awarding organisation must act with honesty and integrity.
- (d) Principle 4 – An awarding organisation must act in a way that maintains and, where possible, promotes public confidence in qualifications.

11.1. A4.5: An awarding organisation must take all reasonable steps to avoid any part of the assessment of a Learner (including by way of Moderation) being undertaken by any person who has a personal interest in the result of the assessment.

## 12. OFQUAL APPRENTICESHIP CONDITIONS

12. EPA3.1 An awarding organisation must promptly notify Ofqual when it has cause to believe that any event has occurred or is likely to occur which could have an Adverse Effect

## 13. QUALIFICATIONS SCOTLAND ACCREDITATION PRINCIPLES

13.1. Principle 4. The awarding body must demonstrate an effective approach to the identification and management of risk.

13.2 Principle 7 – Integrity and Transparency