



School of Coding & AI

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HIGHER EDUCATION

Anti-Bribery Policy

Policy Owner: Mandeep Athwal

Full Name	Position	Signature	Date	Review Cycle
Mandeep Athwal	CEO		01.09.2025	Annual



1. Policy Statement

School of Coding Limited is committed to conducting all business fairly, honestly, and transparently. We have a zero-tolerance approach to bribery and corruption and comply with the UK Bribery Act 2010.

Bribery is a criminal offence and can result in severe penalties for both the company and individuals involved.

2. Purpose

This policy aims to:

- Prevent bribery and corruption in all School of Coding Limited operations.
- Ensure compliance with the UK Bribery Act 2010.
- Provide staff and stakeholders with guidance on recognising and avoiding bribery risks.
- Protect the reputation and integrity of the company.

3. Scope

This policy applies to:

- All employees, directors, contractors, consultants, tutors, and volunteers.
- Any third parties acting on behalf of School of Coding Limited (e.g., suppliers, agents, business partners).
- All business activities, in the UK and overseas.

4. What is Bribery?

Bribery is offering, promising, giving, requesting, or accepting something of value to influence a decision or secure an improper advantage. Examples include:

- Cash payments, gifts, or hospitality offered to gain business.
- Kickbacks from suppliers or contractors.
- Donations or sponsorships intended to influence decisions.
- Favourable treatment in return for personal benefit.

5. Acceptable Practices

The following may be acceptable if reasonable, proportionate, and transparent:

- Small promotional gifts of modest value.
- Corporate hospitality that is infrequent, not excessive, and in line with business practice.
- Charitable donations made openly and with Board approval.

Anything that could be seen as an attempt to improperly influence must be refused.



6. Responsibilities

- Board of Directors – provide oversight and ensure compliance.
- Managers – lead by example, communicate this policy, and monitor risks.
- Employees and Contractors – avoid any activity that could lead to bribery and report concerns immediately.

7. Reporting Concerns

- Any suspicion of bribery must be reported promptly to the Managing Director or via the Whistleblowing Procedure.
- Reports will be treated confidentially and without fear of retaliation.
- The company will investigate all reports fairly and transparently.

8. Record Keeping

- All financial records must accurately reflect transactions.
- Gifts, hospitality, and donations must be logged and approved where appropriate.

9. Breaches of Policy

- Bribery is considered gross misconduct and may result in dismissal.
- Individuals involved may face criminal prosecution, fines, or imprisonment.
- The company may face unlimited fines and serious reputational damage.

10. Monitoring & Review

- This policy will be reviewed annually by the Board.
- Internal audits will check compliance with anti-bribery measures.

Approved by: Manny Athwal

Date: September 2025