

## **Anti-Bribery and Corruption Policy**

**Last updated: 25th June 2026**

**Next review: 25th June 2027**

### **1. Our commitment**

Participation People is committed to conducting all of our activities honestly, ethically and transparently.

We operate a zero-tolerance approach to bribery and corruption and expect the same high standards from everyone who works with or on behalf of our organisation.

We are committed to maintaining strong governance, protecting public trust and ensuring all business relationships are conducted fairly, lawfully and with integrity.

### **2. Purpose**

This policy explains Participation People's commitment to preventing bribery and corruption and outlines the principles that guide how we conduct our business.

It supports compliance with the Bribery Act 2010 and reinforces our commitment to ethical decision-making across all areas of our work.

### **3. Scope**

This policy applies to:

- employees
- agency workers
- temporary workers
- contractors

- consultants
- volunteers
- suppliers
- partners
- any third party acting on behalf of Participation People.

We expect everyone representing Participation People to act with honesty, integrity and professionalism.

## **4. Our approach**

Participation People does not tolerate bribery or corruption in any form.

A bribe is any financial or other advantage that is offered, promised, given, requested or accepted with the intention of improperly influencing a decision or securing an unfair business, commercial, contractual or personal advantage.

No one acting on behalf of Participation People may:

- offer or give a bribe
- request or accept a bribe
- promise an improper financial or other advantage
- seek to influence decisions through inappropriate gifts, payments or hospitality
- engage in any activity that could be perceived as bribery or corruption.

## **5. Gifts and hospitality**

Participation People recognises that modest gifts and reasonable hospitality can play an appropriate role in developing positive professional relationships.

Any gifts or hospitality must always:

- be reasonable and proportionate
- have a legitimate business purpose
- comply with relevant laws and organisational policies
- never create, or appear to create, an obligation or expectation of favourable treatment.

All gifts and hospitality should be declared in accordance with Participation People's internal procedures.

Where approval is required under our internal processes, this must be obtained before gifts or hospitality are offered or accepted.

## **6. Working with suppliers and partners**

We seek to work with organisations that share our commitment to ethical business practices.

When entering into partnerships or commercial relationships, we expect suppliers, contractors and other partners to comply with all relevant anti-bribery legislation and to act with integrity throughout their relationship with Participation People.

## 7. Reporting concerns

Anyone who becomes aware of suspected bribery, corruption or unethical conduct involving Participation People is encouraged to report their concerns as soon as possible.

Concerns can be raised by contacting Participation People directly via **concerns@participationpeople.com**. Reports will be handled sensitively, investigated appropriately and managed in accordance with our Whistleblowing Policy where applicable.

No one will suffer detrimental treatment for raising a genuine concern in good faith.

## 8. Governance and accountability

Participation People is committed to maintaining effective systems and controls to prevent bribery and corruption.

Our leadership team is responsible for promoting a culture of integrity, ensuring this policy is implemented and reviewing our approach regularly to reflect changes in legislation, guidance and organisational practice.

All individuals working on behalf of Participation People are expected to understand and comply with this policy.

## 9. Relevant legislation

This policy is informed by and operates alongside relevant UK legislation, including:

- Bribery Act 2010
- Fraud Act 2006
- Companies Act 2006 (where applicable)
- any other relevant legislation relating to bribery, fraud and corruption.

## 10. Review

This policy will be reviewed annually, or sooner where legislation, organisational learning or best practice requires updates.