

PACE Northwest – Anti-Corruption & Bribery Policy

Approved by: Board of Directors

Applies to: All employees, workers, consultants, contractors, agency staff, interns, volunteers, officers and directors of PACE Northwest, and any third party that performs services for or on behalf of PACE Northwest (“associated persons”).

Effective date: 29 August 2025

Next review due: Annually (or sooner if law or guidance changes)

1. Purpose and scope

PACE Northwest (“the Company”) is committed to conducting business ethically, honestly and in full compliance with the UK Bribery Act 2010 and all applicable anti-corruption laws wherever we operate. This policy sets out mandatory rules for preventing, detecting, and responding to bribery and corruption risks in our training and education services, including public-sector tenders, commercial contracts, accreditation and assessment activities, sponsorships, grants and scholarships, and relationships with agents, resellers and delivery partners.

This policy applies worldwide to everyone acting for or on behalf of PACE Northwest. Breaches may result in disciplinary action (up to and including summary dismissal), termination of contracts, civil claims and criminal liability for individuals and the Company.

2. Core principles

PACE Northwest implements and continually improves anti-bribery procedures aligned to the six principles in UK Government guidance: **proportionality, top-level commitment, risk assessment, due diligence, communication & training, and monitoring & review.**

3. What is bribery?

Bribery is offering, promising, giving, requesting, agreeing to receive, or accepting a financial or other advantage to induce or reward improper performance of a relevant function or activity. It also includes bribery of foreign public officials. “Improper performance” means performance in breach of an expectation of good faith, impartiality, or trust. Bribery can be public- or private-sector and can occur directly or indirectly through third parties.

Examples relevant to a training company include:

- Offering a procurement official hospitality or benefits to influence a framework award or score.
- Providing cash, gifts, paid travel, or unnecessary “speaker fees” to a client’s decision-maker to secure a training contract.
- Offering free qualifications, course places, equipment or scholarships to a customer contact to influence purchasing decisions.
- Paying an agent or reseller a commission knowing or suspecting that some will be used to bribe.
- Giving vouchers or gifts to an accreditation assessor or invigilator to overlook non-compliance.

4. Zero-tolerance statement

PACE Northwest prohibits:

- Bribery in any form (public or private, direct or indirect).
- **Facilitation payments** (small payments to secure routine actions). These are prohibited. If you face a **genuine and immediate threat to life, liberty or safety**, prioritise personal safety and report the incident as soon as possible (see §14).
- **Improper gifts, hospitality or expenses** intended to influence a decision or that could reasonably be perceived as such (see §8).
- **Secret commissions, kickbacks or undisclosed rebates.**
- **Political donations** on behalf of the Company (see §9).
- **Improper charitable donations and sponsorships** used as a conduit for influence (see §10).

5. Roles and responsibilities

- **Board and CEO:** set the tone, approve this policy, allocate resources, oversee risk assessment and program effectiveness.

- **Compliance Lead** (Policy Owner): maintains procedures, advises on risks, provides training, oversees investigations, maintains registers and reports to the Board.
- **Managers**: implement controls in their teams (sales, bid, delivery, accreditation, procurement, finance), ensure training and maintain local risk registers.
- **All staff and associated persons**: read, understand and comply with this policy and complete mandatory training.

Contact: becs@pace-com.org (or named Compliance Lead)

6. Risk assessment (at least annually)

We identify and document bribery risks specific to our operations, including: public-sector procurement; work in higher-risk jurisdictions; use of introducers/agents; cash-equivalent vouchers; gifts/hospitality around bid events; accreditation and assessment risks; scholarships and bursaries; sponsorships; and conflicts of interest. We assign owners, likelihood/impact ratings, and mitigation actions, and we review risks when entering new markets, launching new offerings or partnering with new intermediaries.

7. Due diligence on third parties and projects

Before engaging **agents, introducers, resellers, consultants, delivery partners, subcontractors, franchisees, or co-marketing partners**, we perform proportionate due diligence, typically including: corporate and ownership checks; sanctions/PEP screening where relevant; adverse-media review; reference checks; verification of qualifications for trainers/assessors; confirmation of anti-bribery controls; and contractually binding compliance obligations. Enhanced steps apply in higher-risk scenarios or jurisdictions.

Required contractual clauses (summarised): compliance with anti-bribery laws; no facilitation payments; audit/inspection rights; accurate books and records; training obligations; right to withhold payments/terminate for breach; obligations to report suspected bribery promptly.

8. Gifts, hospitality, travel and expenses

8.1 Principles

- Must be **reasonable, proportionate, and bona fide**, with a clear business purpose, and **never offered, promised, given, requested or accepted to influence** a decision or as a reward.

- **Cash or cash equivalents** (e.g., gift cards, vouchers, crypto) are **prohibited**.
- Extra caution with public officials, accreditation bodies, examiners, invigilators, and anyone evaluating bids.

8.2 Monetary thresholds and approvals (default limits)

- **Token value:** up to **£25** – permitted without pre-approval if not during tenders/assessments and recorded where practical.
- **Standard hospitality/gifts: £25–£100** – line-manager pre-approval and **record in the Gifts & Hospitality Register**.
- **Over £100 or involving travel/overnight accommodation** – **Compliance Lead pre-approval** required and recorded.
- **During live tenders, evaluations, audits or assessments** – **no gifts or hospitality** to decision-makers or assessors.

8.3 Travel & events

PACE Northwest may pay reasonable, economy-class travel and modest subsistence for legitimate training delivery or speaker engagements when **not** linked to awarding/retaining business and when paid to the organisation (not the individual) where appropriate. Spouses/partners' costs are not permitted.

9. Political activity

PACE Northwest **does not make political donations**. Personal political activity by staff must be kept separate from Company resources, time and identity, and any potential conflict of interest must be disclosed.

10. Charitable donations, sponsorships, scholarships and discounts

All charitable donations and sponsorships must be vetted to ensure they are not used to improperly influence a decision-maker. Scholarships, bursaries, discounts or free places must be awarded using transparent, objective criteria approved by the Compliance Lead and recorded.

11. Conflicts of interest

Employees and associated persons must disclose actual or potential conflicts (e.g., family relationships with customer staff, assessors or officials; outside employment with suppliers; ownership interests) before participating in related decisions. The Compliance Lead will agree mitigations (e.g., recusal).

12. Books, records and financial controls

We maintain accurate books and records that fairly reflect all transactions and disposition of assets. False, misleading or off-book entries are prohibited. All payments must be supported by genuine invoices/receipts, reviewed, approved in line with delegated authorities, and paid through normal banking channels.

13. Working with public officials and in other countries

The Bribery Act applies to UK companies and persons **globally**. Additional local laws may also apply. When dealing with public officials (including employees of state-funded schools, colleges, universities and public bodies), apply enhanced caution and seek Compliance Lead approval for any proposed hospitality or gifts within the limits above. Facilitation payments remain prohibited.

14. Speaking up (reporting) and protection

If you suspect bribery, corruption, improper gifts/hospitality, or any breach of this policy, report it immediately via:

- becs@pace-com.org (monitored confidentially), or
- the anonymous **Whistleblowing Hotline** (details on the intranet), or
- any Director or the Compliance Lead.

Reports will be handled promptly, fairly and, where appropriate, confidentially. PACE Northwest prohibits retaliation against any person who raises a concern in good faith, even if it turns out to be mistaken. Malicious or bad-faith allegations may result in disciplinary action.

15. Investigations and consequences

The Compliance Lead will assess and, where appropriate, investigate allegations. Outcomes may include: no case to answer; corrective actions; additional training/controls; disciplinary measures (up to summary dismissal); termination of third-party contracts; and referral to law-enforcement or regulators when required.

16. Training and communication

- **Induction training** for all new starters within 30 days.
- **Annual refresher** for all staff.
- **Role-specific training** for higher-risk roles (sales & bids, public-sector contracting, international delivery, accreditation, finance, procurement, third-party managers).
- Periodic awareness for high-risk third parties.

17. Programme monitoring & review

- **Registers and metrics:** Gifts & Hospitality Register, Third-Party Register, Due Diligence log, Investigations log, training completion rates.
- **Internal audit / spot checks** on gifts/hospitality, expenses, third-party payments and bid events.
- **Annual effectiveness review** by the Compliance Lead with report to the Board; update this policy and procedures as needed.

18. Related policies and laws

- UK Bribery Act 2010 (sections 1, 2, 6 and 7).
- Procurement & Bid Governance Policy; Expenses Policy; Conflicts of Interest Policy; Whistleblowing Policy; Financial Controls Policy.
- **Failure to Prevent Fraud (ECCTA 2023)** – PACE Northwest maintains a separate Anti-Fraud Policy and “reasonable procedures” aligned to government guidance.

19. Practical do's and don'ts

Always

- record gifts/hospitality and seek pre-approval where required.
- run due diligence before onboarding agents/introducers or delivery partners.
- use written contracts with anti-bribery clauses for all associated persons.
- escalate any pressure to make a facilitation payment.
- keep accurate, complete records.

Never

- offer, promise, give, request or accept anything of value to influence a decision.
- disguise payments as “marketing”, “consultancy” or “speaker fees” where there is no real service.
- give cash or vouchers; provide hospitality during active tenders/evaluations.
- ignore red flags (e.g., unusual payment routes, requests for secrecy, excessive commissions, requests to pay individuals).

20. Administration

Owner: Compliance Lead.

Version control: v1.0 (29 Aug 2025).

Questions about this policy should be directed to becs@pace-com.org.

Appendix A – Gifts & Hospitality Register (template)

Fields: Date; Giver/Recipient; Organisation; Role/relationship; Description; Estimated value; Business purpose; Event/date; Tender/assessment in progress?; Approved by; Decision (accepted/declined/returned); Notes.

Retention: 7 years.

Appendix B – Third-Party Due Diligence Checklist (proportionate)

- Corporate details and beneficial ownership obtained and verified.
- Scope of services; justification for engagement; fee structure proportionate; no success fees that incentivise bribery.
- Sanctions/PEP/adverse-media screening completed where relevant.

- References taken (commercial and, where relevant, governmental/educational).
- Confirmation of anti-bribery controls and commitment; training where applicable.
- Contract signed with audit/termination rights and anti-bribery warranties.
- Local risk considerations assessed (country/sector).
- Approval recorded by Compliance Lead.

Appendix C – Red flags (illustrative)

- Requests for payment in cash, to personal accounts, or offshore entities with no clear reason.
- Unusual commissions, marketing allowances or rebates, particularly around tenders.
- Hospitality/gifts clustered before bid deadlines, evaluations, audits or accreditations.
- Requests to hire or reward relatives of decision-makers.
- Vague service descriptions; refusal to agree to anti-bribery clauses; poor reputation.
- Pressures to make “expediting” payments or to provide certificates/credits where criteria are not met.