



School of Coding & AI

Student First Always

HIGHER EDUCATION

Anti-Bribery Policy

Policy Owner: Suki Gill

Full Name	Position	Signature	Date	Review Cycle
Suki Gill	Principal		01.09.2025	Annual

School of Coding Limited T/A School of Coding & AI
Company Number: 10808021 Registered in England & Wales
Registered Address: Unit 8-8b, Newton Court, Westrand, Pendeford Business Park,
Wolverhampton, WV9 5HB



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: Suki Gill

Date: September 2025