

# Anti-Bribery Policy

## Purpose

The purpose of this policy is to establish rigorous controls to ensure that the Certified Public Accountants Association (CPAA) is compliant with all appropriate anti-bribery and corruption regulations.

## Policy statement

The Bribery Act 2010 defines the act of bribery as the giving or receiving of a financial or other advantage in an attempt to motivate an individual, who holds a position of trust, or carries out a function that would normally be expected to be carried out impartially, into improper performance.

The CPAA has a zero-tolerance approach to all bribery and corruption. As a professional association, we require ourselves to operate in a legal, fair, ethical and professional way. Acts of bribery are not only punishable by fines and prison sentences, they would also greatly affect the CPAA's existing and future business relations and partnerships and would inflict a great deal of damage upon the CPAA's reputation.

As an international association, the CPAA upholds all local laws and regulations in the countries in which we operate, however, regardless of geographical location we are still bound by the relevant laws of the UK, including the Bribery Act 2010.

## Scope of this policy

All CPAA employees, directors, branch officials, contractors, trainees, interns, official agents, consultants, agency staff, fixed term staff and temporary staff (from here within this policy referred to as employees) as well as students are bound by this policy.

Within the context of this policy a third party is any individual or organisation who you come into contact with while studying with the CPAA.

This policy covers the following areas:

- Bribes
- Gifts and Hospitality
- Facilitation Payments
- Political Contributions

- Charitable Contributions

### **Bribes**

Employees and students must not engage in any form of bribery, either directly or indirectly. It should also be noted that this policy explicitly forbids the bribing of foreign public officials anywhere in the world.

### **Gifts and hospitality**

Employees and students of the CPAA must not give, receive or offer hospitality or gifts where these could be regarded as improper, illegal or where they violate the recipient's own policies/ethical guidelines. Equally gifts and/or hospitality should not be offered to or accepted from any public employee, government official, government representative, politician or political party. When the value of an individual gift exceeds £100 and/or the value of hospitality exceeds £800 (total gifts and hospitality to one third party are not to exceed a total value of over £1,500 in any given financial year) authority must be sought from a director.

Where it is not appropriate to decline the gift or hospitality offer, it should be accepted and if approval to keep it is not granted by a director it should be donated to charity.

Given that different regions have different cultural attitudes towards the giving of business gifts, the CPAA requires that all employees and students apply the following test: ask whether, considering the known circumstance, the gift or hospitality is reasonable and justified, and that there is no intent by the giver of the gift to insight improper performance.

### **Facilitation payments**

Facilitation payments are a form of bribery which involve the payment of money, or the transfer of good(s) or service(s), in exchange for expediting or facilitating an individual's performance of their regular duties.

CPAA employees and students must not make or receive facilitation payments.

If a CPAA employee or student is faced with a situation where not making or receiving a facilitation payment could result in personal injury, or injury to their family, friends or co-workers, then the payment should be made or accepted. Though the amount should be kept to a minimum, and the employee's line manager (or the Company Secretary for students) must be informed. A record should be kept of the date the payment was made, the purpose of the payment, the amount, who the payment was made to and why the payment was made.

### **Political contributions**

The CPAA does not make any donations, whether in cash or kind, to any political party, politician or political candidate.

### **Charitable contributions**

Charitable contributions must be made in accordance with local laws and customs. All charitable donations must be publicly disclosed.

### **Your responsibilities**

You must ensure that you have read, understood and comply with this policy. If you need clarification on any elements of this policy, you must consult the Operations Manager.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all employees and students.

If you suspect an instance of bribery or corruption you must inform the Operations Manager, or failing that, an appropriate director or senior staff member.

Any employee or student who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct or exclusion from the qualification. We reserve the right to terminate our contractual relationship with any worker who breaches this policy.

## Record keeping

Comprehensive records must be kept of any gifts or hospitality given or received. These records should be provided to the Operations Manager at least once a month, and must include details of:

- the date of the transaction
- what the transaction was
- why the transaction was made
- who was involved in the transaction
- supporting documents (i.e. invoices, recipes etc.) to support the information

The Operations Manager will record these in the CPAA Gift Register.

## Raising concerns

If you have any concerns, or are unsure if an activity breaches this policy, you should inform your line manager or the Operations Manager who can be contacted at the below address:

Operations Manager

Certified Public Accountants Association

Unit F, First Floor

Lostock Office Park

Lynstock Way

Lostock

Bolton, BL6 4SG

## What to do if you are offered a bribe

If you are offered a bribe you must inform your line manager or the Operations Manager as soon as possible. Failure to do so can result in disciplinary action.

## Protection

The CPAA supports any employee or student who raises a concern in relation to this policy, even if the concern turns out to be a mistake. Under CPAA guidelines you are protected from any negative repercussions related to raising a concern under this policy (this includes threats, discrimination, disciplinary action etc.). If you have raised a concern relating to this policy and feel as though you have

been the victim of negative repercussions as a consequence you should contact the Operations Manager or use the CPAA's official grievance procedures.

### **Training and communication**

All CPAA employees receive training on this policy, both upon induction and at regular intervals during their employment.

All CPAA students receive this policy upon induction and are encouraged to familiarise themselves with the content.

The CPAA's zero tolerance approach to bribery and corruption must be communicated to all third parties.

### **Responsibility**

All CPAA employees and students are responsible for maintaining the CPAA's zero tolerance approach to bribery and corruption.

Ultimately the Council of Management (the directors) hold responsibility for this policy. On a day-to-day basis, the Operations Manager has responsibility for the implementation of this policy.

### **Monitoring and review**

The Operations Manager keeps this policy under constant review to ensure its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. All internal control systems are subjected to regular audits.

Employees and students are invited to comment on this policy and suggest improvements, these comments and suggestions should be addressed to the Operations Manager.

This policy may be amended at any time.