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| Policy Name:  | <b>Anti-Bribery and Corruption Policy</b>  |
| Policy Ref:   | POL/AB/AB/CC/0001  |
| Who it applies to:  | <i>CILEX Employees, Volunteers, CILEX Board, Committee Members and Trustees (including any of its intermediaries or other Associated Persons</i> |
| Date of issue:  | March 2019   |
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| Policy Type:  | Corporate  |
| Policy Owner:   | Corporate Compliance Manager   |
| Approved by:  | Corporate Policy Review Panel  |
| Equality Impact Assessment Screened   | Yes  |
| Contractual terms and conditions which will be changed following legal requirements | Yes  |

## Anti-Bribery and Corruption Policy

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# Introduction

This policy forms part of the Chartered Institute of Legal Executives' (CILEX) internal control and corporate governance arrangements. CILEX means here the Chartered Institute of Legal Executives and its subsidiaries.

The CILEX Board is committed to ensuring that effective policies operate throughout the organisation.

This policy is contractual and is intended as a statement of current CILEX policy and its commitment to operate a fair procedure, taking into account statutory and other guidelines. CILEX, therefore reserves the right to amend this policy and procedure as necessary to meet any changing requirements.

One of CILEX's core values is to conduct its business fairly, openly, and honestly with a zero-tolerance approach to bribery and corruption. CILEX is committed to promoting and maintaining the highest level of ethical standards, in relation to all its business activities. Its reputation for maintaining lawful business practices is of paramount importance and this policy is designed to preserve these values.

## Purpose and Scope of the Policy

Bribery is not only unethical, but illegal under the **Bribery Act 2010** and individuals found guilty can be punished by up to 10 years' imprisonment and/or an unlimited fine. As an organisation, the repercussions could be anything from damage to reputation, an unlimited fine, to the exclusion from tendering for contracts.

Anyone found to be involved in bribery will be dealt with under the CILEX Disciplinary Procedure and could potentially face dismissal and/or other sanctions.

This policy is based on the Anti-Bribery legislation (the Bribery Act 2010), which requires that all permanent, temporary employees, volunteers, CILEX Board and Committee Members and Trustees (including any of its intermediaries, subsidiaries, or associated companies) must not either directly or indirectly:

- A) Offer, give, solicit, or accept any bribe, either in cash or any form in inducement to or from any person or company, wherever they are located and whether they are a public official, a body, a private person, or company.
- B) Gain or retain any commercial, contractual, or regulatory advantage through unethical or illegal means when conducting business on behalf of CILEX.

This policy should be read in conjunction with the [Fraud Policy](#) as well as the [Gifts and Hospitality Policy](#).

# Responsibilities

All permanent, temporary employees, volunteers, CILEX Board and Committee Members and Trustees (including any of its intermediaries, subsidiaries or associated companies) are expected to understand and adhere to the principles set out in this Policy, as well as prevent, detect and report any forms of bribery or corruption and they are required to:

- comply with any anti-bribery and anti-corruption legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct business.
- understand the risks associated with bribery by undertaking training courses as required and encourage vigilance and effectively recognise, prevent, and report any wrongdoing, whether by themselves or by others.
- act honestly, responsibly and with integrity.
- safeguard and uphold the organisation's core values by operating in an ethical, professional, and lawful manner at all times.

CILEX Management are responsible for:

- developing and maintaining effective controls to help prevent or detect bribes.
- carrying out vigorous and prompt investigations if a bribe occurs.
- taking appropriate disciplinary and/or legal action against perpetrators of bribes.
- taking disciplinary action against any party whose failures have contributed to the commission of the bribe.

It is the responsibility of the Corporate Compliance Manager to ensure that this policy is reviewed and revised as necessary to take into account stakeholder feedback, recommendations from regulatory authorities, changes in legislation or other relevant factors.

# Legal Obligations

The legislation which this policy is based on is the Bribery Act 2010.

# References

- Archive, Retention and Destruction Policy
- Corporate Complaints Policy
- [Disciplinary Procedure](#)
- [Fraud Policy](#)
- [Gifts and Hospitality Policy](#)
- [Modern Slavery Policy](#)
- [Personal Interest Policy](#)
- [Procurement and Tendering Policy](#)
- [Risk Management Policy](#)
- [SAR \(Suspicious Activity Reporting\) Policy](#)
- [Whistleblowing Policy](#)