

# **Anti-Bribery Policy**

## **Strategic Data Consultancy Ltd**

**Document Ref:** SDC-POL-ABC-001

**Version:** 1.0 – Initial Version

**Date:** 12 April 2026

**Review Date:** 11 April 2027

---

### **1. Purpose**

This policy sets out Strategic Data Consultancy Ltd's (SDC) commitment to conducting business honestly, ethically, and with integrity.

Bribery and corruption in any form are prohibited. This policy supports compliance with the Bribery Act 2010.

---

### **2. Scope**

This policy applies to all individuals working with or on behalf of SDC, including:

- Employees
  - Directors
  - Contractors
  - Consultants and associates
  - Subcontractors and suppliers where relevant
- 

### **3. Prohibited Conduct**

You must not:

- Offer, promise, give, request, or accept any bribe, whether directly or indirectly
- Make facilitation payments, even where such payments are considered customary
- Offer gifts, hospitality, or expenses with the intention of influencing a business decision

A bribe includes any financial or other advantage intended to induce or reward improper performance.

---

### **4. Hospitality and Gifts**

Hospitality and gifts must:

- Serve a legitimate business purpose
- Be reasonable, proportionate, and transparent
- Never influence or appear to influence a business decision

#### **Acceptable examples include:**

- Modest meals linked to business meetings
- Refreshments during site visits
- Low-value promotional items (e.g. branded notebooks or pens)
- Attendance at industry events with clear professional value

**Unacceptable examples include:**

- Cash or cash equivalents
- Excessive hospitality, entertainment, or alcohol
- Hospitality during tender or procurement decisions
- Repeated hospitality from the same source
- Any benefit offered in return for preferential treatment

All hospitality must withstand external scrutiny.

---

**5. Conflicts of Interest**

You must avoid situations where personal interests conflict with the interests of SDC.

This includes:

- Financial interests
- Personal relationships
- Outside employment
- Benefits offered by third parties

Any actual or potential conflict must be disclosed in writing to a Director as soon as it arises.

---

**6. Reporting Concerns**

Any suspicion of bribery, corruption, or improper conduct must be reported immediately.

Reports can be made:

- Directly to the Director
- By email, telephone, or in person

All concerns will be treated confidentially so far as reasonably practicable.

Individuals raising concerns in good faith will not suffer detriment or retaliation.

---

**7. Investigation Process**

All reports will be:

- Assessed promptly
- Investigated where appropriate
- Managed proportionately based on the nature of the concern

Investigations will involve fact-finding and review of relevant information.

Where possible, investigations will be completed within 28 days. Where this is not achievable, updates will be provided.

Appropriate action will be taken based on findings, including corrective or disciplinary action where necessary.

---

**8. Training and Awareness**

SDC is committed to maintaining awareness of anti-bribery and corruption risks.

Personnel are expected to:

- Familiarise themselves with this policy

- Apply its principles in their day-to-day work

Guidance and support will be provided where required.

---

## **9. Related Policies**

This policy should be read alongside:

- Whistleblowing Policy (SDC-POL-WB-001)
  - Ethical Procurement Policy (SDC-POL-EP-001)
  - Modern Slavery Policy (SDC-POL-MOD-001)
- 

## **10. Responsibility**

Overall responsibility for this policy sits with:

**John Sutherns – Director**

---

**Signed:**

John Sutherns  
Director