

Anti-Bribery Policy



POLICY CONTEXT

The SBTD Board of Directors and the Charitable Trustees, expect all SBTD personnel to demonstrate honesty, integrity, high standards of professionalism and ethical conduct in all their activities at all times. The SBTD also expects its partners, advisors, clients, customers, suppliers, contractors, consultants and all stakeholders, along with their personnel, to adopt the same standards. In the event that an organisation, or individual is unclear as to whether this policy applies to them, they should operate on the basis that it does.

Bribery occurs when someone offers, seeks, or accepts a payment, gift or favour that influences a business outcome improperly. In the SBTD context, a business outcome also includes any academic one.

The SBTD has a zero-tolerance approach to bribery, or any other form of corrupt, or dishonest behaviour.

SBTD Personnel will never seek, accept, or give a bribe, facilitation payment, kickback, or other improper payment.

OUR POLICY

We will take appropriate steps to ensure that:

1. We do not offer, promise, give, accept, or demand a bribe, or other undue advantage (including excessive gifts and hospitality) in order to obtain, or retain business, or gain any other improper advantage.
2. We do not offer, nor give in to demands, to make illicit, or illegal payments to agents, public officials (at whatever level), or anybody else with whom we do business.
3. We engage and remunerate agents and other third parties only for legitimate services, consistent with the terms of their contract. We will use our best endeavours to ensure that we do not allow others to offer, promise, give, accept, or demand a bribe on our behalf.
4. We promote personnel awareness of, and compliance with, SBTD policies against bribery, through briefings and appropriate dissemination of our own procedures (including disciplinary procedures) and policies. Particular attention is paid to ensuring that, as part of their induction, all personnel are aware of the SBTD's stance on bribery and all other forms of dishonest behaviour.
5. We adopt management control systems that discourage bribery and adopt sound financial, tax accounting and auditing practices that seek to prevent it.

6. We raise awareness of the need to combat bribery with our partners and stakeholders by publication of this Policy and (where appropriate) through rigorous systems of contract management.

GUIDANCE TO PERSONNEL

If you have any concerns that an action, or suggested action, may constitute bribery, contact any Director, or the Administrator. If you believe you are being put under duress to accept, or condone a bribe, you should seek advice and support immediately, either from any Director, or the Administrator.

APPROPRIATE STEPS

The SBTD will take steps to comply with this policy, which will be identified following a risk assessment.

They will include:

- Review and revision, as appropriate, of policies and procedures, particularly in the areas of Human Resources and Finance
- Review and revision, as appropriate, of procedures for establishing and managing contracts
- Training and Awareness-raising for Directors and personal.

<https://www.doingbusinesswithoutbribery.com>

Review

This policy will be reviewed every 2 years

A handwritten signature in black ink, appearing to be 'M. J. M.', written in a cursive style.

Signed:

Date: 26th March 2026