



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Impact Justified Ltd

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1. Policy Statement

Impact Justified Ltd is committed to conducting business ethically, honestly, and with integrity. We have a zero-tolerance approach to bribery and corruption in all their forms.

This policy applies to all business activities, regardless of location. It covers all individuals working for or on behalf of Impact Justified Ltd, including myself as Founder, and any future employees, associates, contractors, agents, or other representatives.

As a consultancy working with public sector bodies and organisations in highly regulated sectors including nuclear, defence, water, energy, transport, and healthcare, we recognise the critical importance of maintaining the highest standards of integrity in all our dealings.

2. Purpose and Scope

The purpose of this policy is to:

- Set out the responsibilities of Impact Justified Ltd and those working for or with us in observing and upholding our position on bribery and corruption
- Provide information and guidance on recognising and dealing with bribery and corruption issues
- Ensure compliance with the Bribery Act 2010 and other applicable anti-corruption laws

Bribery is a criminal offence. The Bribery Act 2010 makes it an offence to offer, promise, give, request, agree to receive, or accept bribes. It also creates a corporate offence of failing to prevent bribery. Penalties for individuals include up to ten years' imprisonment and unlimited fines. Organisations face unlimited fines and potential debarment from public contracts.

3. Definitions

3.1 Bribery

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical, or a breach of trust. A bribe can take many forms, including cash, gifts, hospitality, favours, or other benefits.

3.2 Corruption

Corruption is the misuse of public office or position for private gain, or the misuse of private position in business dealings. It includes, but is not limited to, bribery, extortion, fraud, and money laundering.

Impact Justified Limited

Registered in England & Wales | Company No. 16831244 | VAT No. 507 8931 67
Registered Office: Lynmere Moss Farm, Delamere, CW8 2JD

3.3 Facilitation Payments

Facilitation payments are unofficial payments made to public officials to secure or expedite routine or necessary actions. These are illegal under the Bribery Act 2010.

4. Prohibited Conduct

The following conduct is strictly prohibited:

- Offering, promising, or giving a bribe to any person
- Requesting, agreeing to receive, or accepting a bribe from any person
- Bribing a foreign public official
- Making facilitation payments
- Making political donations on behalf of the company to gain business advantage
- Making charitable donations that are connected to securing business or advantages
- Engaging any third party who we believe may engage in bribery or corruption

5. Gifts and Hospitality

Gifts and hospitality can, in certain circumstances, amount to bribery. This policy does not prohibit normal and appropriate hospitality or the giving or receiving of modest gifts, provided that:

- They are not made with the intention of influencing a business decision or to obtain an advantage
- They are not offered to or received from public officials or politicians during a procurement process or contract negotiation
- They comply with local laws and the recipient's own policies
- They are given openly, not secretly
- They are reasonable and proportionate in value
- They are not cash or cash equivalents

As a guide, gifts with a value exceeding £50 or hospitality exceeding £100 should be carefully considered and recorded. Any gift or hospitality that could create an appearance of impropriety should be declined.

6. Working with Third Parties

We may be held liable for acts of bribery committed by third parties acting on our behalf. When engaging associates, subcontractors, agents, or other third parties, we will:

- Conduct appropriate due diligence before entering into any relationship
- Ensure contracts include appropriate anti-bribery provisions
- Make third parties aware of this policy and our expectations
- Monitor relationships and terminate any where there are concerns about integrity

7. Public Sector Work and Procurement

A significant proportion of our work involves public sector clients and procurement processes. We are committed to competing fairly for all contracts and will:

- Never seek to improperly influence the outcome of procurement processes
- Provide accurate and honest information in all tender submissions
- Declare any actual or potential conflicts of interest
- Not offer gifts or hospitality to public officials involved in procurement decisions
- Comply with all applicable procurement regulations and client requirements

8. Conflicts of Interest

Impact Justified Limited

Conflicts of interest can create conditions conducive to bribery and corruption. We will identify, declare, and manage conflicts of interest appropriately. Any situation where personal interests could, or could appear to, influence professional judgement must be disclosed and managed.

9. Record Keeping

We will maintain accurate financial records and ensure that all payments and transactions are properly authorised and recorded. Records will be kept of:

- All gifts and hospitality given or received above £50 in value
- Any conflicts of interest declared
- Due diligence conducted on third parties
- Any concerns raised and how they were addressed

10. Responsibilities

10.1 Founder

As Founder and sole director, I, John Edwards, have overall responsibility for ensuring this policy is implemented and complied with. I am responsible for setting the tone from the top and demonstrating commitment to ethical business practices.

10.2 All Personnel

All individuals working for or on behalf of Impact Justified Ltd are responsible for:

- Reading, understanding, and complying with this policy
- Avoiding any activity that might lead to a breach of this policy
- Raising concerns about any suspected bribery or corruption
- Reporting any request or demand for an improper payment

11. Raising Concerns

Anyone who has a concern or suspects that bribery or corruption has occurred or may occur should report it immediately. Concerns can be raised directly with John Edwards at john@impactjustified.co.uk.

We are committed to ensuring that no one suffers detrimental treatment as a result of raising genuine concerns in good faith. This includes protection for whistleblowers under the Public Interest Disclosure Act 1998.

All reports will be treated confidentially and investigated appropriately. Where concerns are substantiated, appropriate action will be taken, which may include termination of contracts and reporting to relevant authorities.

12. Consequences of Breach

Any breach of this policy is a serious matter. Breaches may result in:

- Termination of employment or contractual relationship
- Disciplinary action
- Reporting to relevant authorities and potential criminal prosecution
- Civil action for recovery of losses

13. Training and Communication

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This policy will be communicated to all individuals working for or on behalf of Impact Justified Ltd. Should the business grow to include employees or regular associates, appropriate training will be provided to ensure understanding of anti-bribery requirements and how to apply this policy in practice.

14. Monitoring and Review

This policy will be reviewed annually, or sooner if there are changes to legislation, business activities, or following any incident. The effectiveness of our anti-bribery procedures will be assessed as part of the review.

This policy is available to clients and other stakeholders on request.

Declaration

I confirm my commitment to this Anti-Bribery and Anti-Corruption Policy and will ensure it is implemented in all business activities.

Signed:

John Edwards

Date:

09/01/2026

John Edwards
Founder, Impact Justified Ltd