



OUR ANTI-BRIBERY POLICY

Here at Astrantia People Consulting Limited, we work hard to make sure our business operations are sound, responsible and fair. We are committed to promoting and maintaining the highest possible ethical standards in relation to our business activities. It is really important that we maintain lawful business practices.

We have a zero tolerance policy towards bribery and corruption. We are committed to acting fairly and with integrity in all of our business dealings and relationships wherever we operate. We work hard to make sure our systems, processes and procedures counter bribery.

This policy sets out our position in relation to bribery and corruption. It also:

- enables us to be compliant with anti-bribery laws, rules and regulations in the UK where our business operates;
- makes sure people associated with Astrantia People Consulting Limited understand the risks associated with unlawful conduct and encourages them to be vigilant, effectively recognise, prevent, avoid and report any wrongdoing;
- provides suitable and secure reporting and communication channels, ensuring that any information that is reported is done so properly and dealt with effectively; and
- creates and maintains a rigorous and effective framework for dealing with any suspected instances of bribery or any other unethical conduct.

Legal obligations

We've based this policy on UK legislation, the Bribery Act 2010. It also applies to our company's conduct both in the UK and abroad.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person) whether within the UK or abroad, with the intention of inducing or rewarding improper conduct;
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct; or
- bribe a foreign public official.

You can be held personally liable for any such offence. It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business for our company, Astrantia People Consulting Limited. We can be liable for this offence where we have failed to prevent a person associated with our company from doing that. As well as an unlimited fine, we could also suffer substantial reputational damage in connection with this offence.

Our Policy

All our employees and people associated with our company 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;



- act honestly, responsibly and with integrity; and
- safeguard and uphold Astrantia People Consulting Limited's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

We recognise that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Irrespective of that, we will adhere to the guidelines set out in this policy at all times.

The following is a non-exhaustive list of possible issues which may raise bribery concerns and are things that we want to avoid here at Astrantia People Consulting Limited:

- a third party insisting on receiving a commission or fee before committing to signing a contract with us, or carrying out a government function or process for us;
- a third party requesting payment in cash, or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requesting an unexpected additional commission or fee to facilitate a service;
- a third party demanding lavish, extraordinary or excessive gifts or hospitality before commencing or continuing contractual negotiations or provision of services;
- being offered an unusually lavish, extraordinary or excessive gift or hospitality by a third party;
- receiving an invoice from a third party that appears to be non-standard or extraordinary; and/or
- being invoiced for a commission or fee payment that appears large given the service stated to have been provided.

Business Gifts

The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage;
- it complies with local laws.
- it is given by Astrantia People Consulting Limited, not by an individual;
- it does not include cash or a cash equivalent (such as gift vouchers);
- it is of an appropriate and reasonable type and value and given at an appropriate time;
- it is given openly, not secretly; and
- it is approved in advance by a Director of the Company.

It is not acceptable to give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

For the avoidance of doubt, any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.



Charitable Donations

We may on occasion make donations to registered (non-profit) charities. Any donations we do make, will be recorded on an internal register, along with proof that the donation has been made.

Political Donations

Astrantia People Consulting Limited does not make any political donations. We are not affiliated with any political party or with any organisation whose activities are primarily political.

People associated with our company are free to make personal donations, as long as they are not made on behalf of Astrantia People Consulting Limited, or made to obtain any form of advantage in a business transaction.

Responsibilities and Reporting

It is the responsibility of all people associated with Astrantia People Consulting Limited to take whatever reasonable steps are necessary to make sure they comply with this policy and to prevent, detect and report any suspected bribery or corruption.

We encourage everyone working with us and for us to be vigilant and to report any inappropriate or unlawful conduct, suspicions or concerns promptly and without undue delay. Astrantia People Consulting Limited is committed to taking appropriate action against bribery or other unethical conduct. That could include reporting the matter to an appropriate external government department, regulatory agency or the police.

We will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are also committed to making sure nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

We will make sure that any contract or agreement entered into by us as a company, contains an appropriate clause aimed at making sure any third party to the contract is aware of and agrees to adhere to the contents of this policy and further, that the contract expressly sets out the consequences of non-compliance including, where appropriate, clear provision for terminating the contract in the event of non-compliance or the commission of any relevant bribery offence.

Data Protection

If concerns are raised or a report is received by Astrantia People Consulting Limited, we will process any information and data, including any personal data, in accordance with our data protection policy and any internal privacy notices in force at the relevant time.

Inappropriate access or disclosure of this data will constitute a data breach and will be reported to our Data Protection Officer in line with our policy so that we can take the necessary steps to investigate and address that.

Monitoring compliance

The company directors of Astrantia People Consulting Limited are responsible for making sure we are compliant with this policy and will regularly monitor and review it to make sure we remain compliant with our legal and ethical responsibilities.

Helping leaders elevate their people
experience to drive business growth



If you do have any questions or require any further information about any aspects of this Policy, or about the procedure we follow, please do contact Sam Baker, Director of Astrantia People Consulting Limited by email at sam@astrantiapeople.co.uk

This Policy was last reviewed and updated: January 2025.