



Anti-Bribery Policy

Gtec Media Limited

Policy Owner: Gtec Media Limited

Approved By: Geoff Hunter, Director

Effective Date: 18th Feb 2026

Review Date: Annually

Version: 1.0

1. Policy Statement

Gtec Media Limited is committed to conducting all business activities ethically, honestly, transparently and in compliance with the Bribery Act 2010 and all applicable legislation.

The organisation operates a zero-tolerance approach to bribery, corruption, facilitation payments, kickbacks and improper business practices in all areas of its operations.

Gtec Media Limited will not:

- Offer, promise or give bribes;
- Request, agree to receive or accept bribes;
- Make facilitation payments;
- Engage in corrupt business practices;
- Permit any person acting on behalf of the organisation to engage in bribery or corruption.

This policy applies to all business dealings, public sector work, suppliers, subcontractors, partners, clients, learners and stakeholders.

2. Scope

This policy applies to:

- Directors;
- Employees;
- Tutors and trainers;
- Contractors and associates;
- Subcontractors;
- Consultants;
- Volunteers;
- Any third party acting on behalf of Gtec Media Limited.

The policy applies across all organisational activities including:

- Adult Skills and Learning provision;
- Online and classroom-based training;
- Digital inclusion programmes;
- IT support and technical services;
- Website maintenance and cybersecurity services;
- Digital marketing and advertising services;
- Research and consultancy activities;
- Public sector and private sector contracts.

3. Legal Framework

This policy is designed to ensure compliance with:

- The Bribery Act 2010;
- Fraud Act 2006;
- Public Contracts Regulations 2015;
- Relevant procurement and public sector integrity requirements.

Failure to comply with anti-bribery legislation may result in:

- Criminal prosecution;
- Fines and penalties;
- Contract termination;
- Exclusion from public procurement opportunities;
- Disciplinary action.

4. Definition of Bribery

Bribery is the offering, promising, giving, requesting or accepting of an advantage or financial incentive intended to improperly influence a decision or secure an unfair business advantage.

Examples include:

- Cash payments;
- Gifts intended to influence decisions;
- Undisclosed commissions or kickbacks;
- Improper hospitality;
- Preferential treatment;
- Facilitation payments;
- Offering services or benefits in exchange for contracts or favourable outcomes.

5. Gifts and Hospitality

Reasonable and proportionate hospitality may be acceptable where it:

- Is lawful;
- Is transparent;
- Is not intended to influence decision-making;
- Does not create a conflict of interest;
- Is appropriate to the business relationship.

Excessive, inappropriate or frequent gifts or hospitality must not be offered or accepted.

Cash gifts are strictly prohibited.

6. Procurement and Contracting

Gtec Media Limited is committed to fair and transparent procurement practices.

The organisation will:

- Compete fairly for contracts;
- Avoid conflicts of interest;
- Maintain accurate records;
- Comply with public procurement rules;
- Declare any potential conflicts;
- Avoid inappropriate influence over procurement decisions.

No employee, contractor or representative may offer incentives to secure contracts or favourable treatment.

7. Responsibilities

Directors and Management

Directors and management are responsible for:

- Promoting ethical business conduct;
- Ensuring compliance with this policy;
- Monitoring risks relating to bribery and corruption;
- Investigating concerns appropriately.

Employees and Representatives

All personnel are responsible for:

- Complying with this policy;
- Reporting suspected bribery or corruption;
- Acting honestly and ethically;
- Avoiding conflicts of interest.

8. Reporting Concerns

Any suspected bribery, corruption or unethical behaviour must be reported immediately to management.

Reports will be handled confidentially wherever possible.

No individual will suffer retaliation for raising genuine concerns in good faith.

9. Record Keeping

Gtec Media Limited will maintain accurate and transparent financial and business records, including:

- Invoices;
- Expenses;
- Payments;
- Procurement decisions;
- Contract documentation;
- Hospitality records where appropriate.

False, misleading or incomplete records are prohibited.

10. Training and Awareness

Where appropriate, Gtec Media Limited will ensure that employees, contractors and relevant personnel are made aware of:

- Anti-bribery responsibilities;
- Ethical business conduct;
- Reporting procedures;
- Relevant legal obligations.

11. Monitoring and Review

This policy will be reviewed annually or sooner where:

- Legislation changes;
- Business activities change;
- Risks are identified;
- Procurement requirements are updated.

12. Approval

This policy has been approved and adopted by Gtec Media Limited and applies across all organisational operations and services.

Signed:

Geoff Hunter

Director

Gtec Media Limited