



**SOTERIA  
PEOPLE**  
PROTECT - ENVELOP - NURTURE

# **SOTERIA PEOPLE**

**POLICY  
DOCUMENT**

## **Anti-Corruption and Bribery Policy**

# Anti-Corruption and Bribery Policy

## 1. Introduction

Soteria People Ltd is committed to conducting business with integrity, transparency, and accountability. We take a zero-tolerance approach to bribery and corruption and comply fully with the UK Bribery Act 2010 and other relevant legislation.

## 2. Purpose

This policy aims to prevent bribery and corruption in all our operations, ensuring that all employees, consultants, and associates conduct business ethically and responsibly.

## 3. Scope

This policy applies to all employees, directors, consultants, contractors, and any other individuals acting on behalf of Soteria People Ltd, including third-party partners.

## 4. Definition of Bribery and Corruption

**Bribery:** The offering, giving, receiving, or soliciting of anything of value to influence a business decision.

**Corruption:** Dishonest or fraudulent conduct by those in power for personal gain.

## 5. Prohibited Conduct

Soteria People Ltd strictly prohibits:

Offering, giving, or accepting bribes in any form

Making facilitation payments to expedite routine transactions

Accepting or providing gifts, hospitality, or entertainment intended to improperly influence a business decision

Engaging in corrupt practices or any form of fraudulent activity

Failing to report bribery, corruption, or conflicts of interest

## 6. Gifts and Hospitality

Modest gifts and hospitality may be acceptable if they are reasonable, proportionate, and for legitimate business purposes

Employees must seek approval from management before accepting or offering any gifts or hospitality

Any gifts or hospitality above a certain value must be recorded in the company's gift and hospitality register

## 7. Responsibilities

All employees must adhere to this policy and report any suspected breaches immediately

Managers are responsible for enforcing compliance and ensuring staff understand anti-corruption practices

The Compliance Officer will oversee adherence to this policy and conduct periodic risk assessments.

## 8. Reporting and Whistleblowing

Employees and third parties are encouraged to report any concerns regarding bribery or corruption via our confidential reporting system. No employee will suffer retaliation for raising concerns in good faith

## 9. Compliance & Training

Regular training will be provided to employees on anti-bribery and corruption laws and best practices

Internal audits will be conducted to monitor compliance with this policy

## 10. Consequences of Non-Compliance

Violations of this policy will result in disciplinary action, including possible dismissal and legal proceedings. Soteria People Ltd reserves the right to terminate contracts with third parties found to be in breach of this policy

## 11. Review & Updates

This policy will be reviewed annually to ensure its effectiveness and compliance with evolving legislation. Updates will be communicated to all staff and stakeholders

Soteria People Ltd remains committed to maintaining the highest standards of integrity and ethical conduct in all our business activities.

Approved by: Robert Taylor  
Managing Director  
04/02/25



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