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### **Version Control**

<b>Document title</b>	GBS Anti-Bribery and Corruption Policy
<b>Oversight Committee</b>	Executive Board
<b>Policy lead (Staff member accountable)</b>	Head of HR
<b>Approved by</b>	Executive Board
<b>Approval date</b>	February 2022
<b>Date effective from</b>	February 2022
<b>Date of next review</b>	February 2025
<b>Version</b>	3.0





## Global Banking School Anti-Bribery and Corruption Policy

### 1. Policy Statement and Scope

1.1. The purpose of this policy is to set out Global Banking School' (GBS) approach to Anti-Bribery and Corruption and to ensure that the policy meets the requirements of the UK Ministry of Justice Anti-Bribery Act 2010.

1.2. This policy applies to all staff, full-time, part-time, or contractual, and third parties associated with GBS.

### 2. Ministry of Justice Anti-Bribery Act 2010

2.1 This policy, based on the Anti-Bribery legislation (the Bribery Act 2010), requires that staff must not either directly or indirectly:

- (a) Offer, give, solicit, or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located and whether they are a public official or body, or private person or company.
- (b) Gain or retain any commercial, contractual, or regulatory advantage through unethical or illegal means when conducting business on behalf of GBS or its subsidiaries.

2.2 Staff and associated persons must understand and strictly comply with the UK Anti-Bribery laws in all countries of the world.

### 3. Definitions

3.1 **Bribery:** Bribery is the offer, promise, giving, demanding, or accepting of an i 0 0 1 67..vdm AMCID[: c



**3.3 Associated Person.** An associated person provides services to GBS or acts on GBS' behalf and could be an employee of any type, consultants, agents and other forms of intermediaries and subsidiaries. Undergraduate and postgraduate students are not



individual or third party who we know or reasonably suspect of engaging in bribery or corruption.

4.5 No member of GBS staff or associated person will suffer penalty or other adverse consequences for refusing to pay bribes even if a refusal may result in loss of business or a delay in proceedings.

4.6 The prevention, detection and reporting of bribery are the responsibility of all staff. They should raise any concerns or allegations of bribery or corrupt activity with the Managing Director or report any such concerns to the Chief Executive Officer. Where staff feel they are not able to report in this way, they should report them through GBS Whistleblowing Policy.

4.7 GBS will ensure it takes appropriate action in response to any reported incidents of bribery or corruption. Investigations of bribery or corrupt activity will follow the principles and procedures set out in this policy. Failure to comply with this policy will lead to disciplinary action and proven allegations will lead to disciplinary action resulting in summary dismissal. In relevant cases, the police and the Serious Fraud Office (SFO) will be informed as certain offences carry criminal liability for individuals concerned and sanctions include significant fines and/or imprisonment.

## **5. Proportionate Procedures**

5.1 GBS will ensure it has procedures in place to prevent bribery by staff and other persons associated with it, including research students as appropriate, which are proportionate to the bribery risks it faces and to the nature, scale, and complexity of GBS' activities.



7.2 Where appropriate, GBS managers nominee will complete sufficient due diligence when entering into arrangements with others to ensure they are not acting corruptly and to periodically monitor their performance to ensure ongoing compliance. They will take appropriate action in respond to any information uncovered as a result of due diligence which gives rise to concern and report any such actions to the Managing Director.

## **8. Communication**

### **8.1 GBS**



10.2 Any issues related to the monitoring and review of this policy, please contact [asqo@globalbanking.ac.uk](mailto:asqo@globalbanking.ac.uk).

## **11. Data Protection and Confidentiality**

11.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioners website](#).d Confidentiality