



WILLIAMS
COLLEGE
CANARY WHARF | LONDON

Anti-Bribery Policy

LAST REVIEW	06/10/2023
NEXT REVIEW	06/10/2024
VERSION NUMBER	2.0
LAST UPDATED BY	Dr. Syed Ali Tarek

Introduction

- Williams College Ltd ("the Company") is committed to conducting business ethically and with integrity. This Anti-Bribery Policy outlines our stance against bribery and corruption and our commitment to complying with the UK Bribery Act 2010.

Scope

- This policy applies to all employees, directors, contractors, consultants, agents, and any other parties acting on behalf of the Company ("Personnel").

Bribery Prohibition

- The Company prohibits the offering, giving, receiving, or soliciting of any bribes, whether directly or indirectly, in any form, for any purpose, or from any source, in all business dealings.

Compliance with the UK Bribery Act 2010

- The Company and all Personnel must comply with the provisions of the UK Bribery Act 2010, which makes it an offence to offer, promise, give, request, or accept a bribe, whether in the UK or abroad.

Prohibited Activities

- The following activities are strictly prohibited:
 - a. Offering, promising, or giving a bribe to any person or organisation, including public officials, private individuals, or businesses, to obtain or retain business or gain any other improper advantage.
 - b. Requesting, agreeing to receive, or accepting a bribe from any person or organisation.
 - c. Facilitating or condoning bribery by third parties acting on behalf of the Company.

Gifts, Hospitality, and Expenses

- a. Gifts, hospitality, or expenses may be offered or received only if they are:
 - i. Of nominal value and proportionate to the circumstances.
 - ii. Offered or received openly and transparently.
 - iii. Not offered or received with the expectation of influencing business decisions.
- b. Approval must be obtained from the appropriate level of management before offering or receiving any gifts, hospitality, or expenses.

Facilitation Payments

- a. The Company strictly prohibits facilitation payments, which are small payments or gifts made to expedite routine government actions.
- b. Personnel must refuse to make or accept facilitation payments in all circumstances.

Record Keeping

- a. Accurate and transparent records of all financial transactions and business dealings must be maintained by the Company.
- b. Personnel must ensure that all transactions are properly recorded and accounted for in accordance with established procedures.

Reporting and Compliance

- a. Personnel must report any suspected or actual breaches of this policy to their line manager, the Compliance Officer, or another appropriate authority.
- b. The Company will investigate all reports of potential breaches promptly and take appropriate disciplinary action where necessary.

Training and Awareness

- a. The Company will provide regular training and awareness programmes to ensure that all Personnel understand their obligations under this policy and the UK Bribery Act 2010.

Review and Update

- This Anti-Bribery Policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations.

Contact Information

- For inquiries or concerns regarding this policy, please contact the Compliance Officer at hoa@williamscollege.uk

By adhering to this Anti-Bribery Policy, the Company demonstrates its commitment to ethical conduct and integrity in all business dealings.