

ANTI-BRIBERY AND CORRUPTION POLICY

1. Policy Statement

Carver Coaching Ltd is committed to conducting business with integrity, transparency and accountability. We operate a zero-tolerance approach to bribery and corruption in all forms and are committed to complying with the Bribery Act 2010 and all other applicable legislation. Bribery and corruption undermine trust and damage public confidence. As a provider of services to public sector and social purpose organisations, we recognise our heightened responsibility to operate ethically at all times.

2. Scope

This policy applies to:

- The Director
- All Associates
- Contractors and subcontractors acting on behalf of Carver Coaching Ltd

3. Definition of Bribery

Bribery includes offering, giving, requesting or accepting anything of value in order to improperly influence a decision or secure an unfair advantage.

This includes:

- Financial payments
- Gifts or hospitality
- Favourable treatment
- Facilitation payments

Facilitation payments are not permitted under this policy.

4. Gifts and Hospitality

Carver Coaching Ltd recognises that reasonable and proportionate hospitality may form part of legitimate business relationships.

However:

- Gifts or hospitality must never influence, or appear to influence, business decisions.

- Gifts of significant value must not be accepted or offered.
- All hospitality must be proportionate and transparent.
- A Gifts and Hospitality Register is maintained where appropriate.

Associates must notify the Director of any offer that may present a conflict of interest.

5. Conflicts of Interest

All personnel must avoid situations where personal interests could conflict with business responsibilities.

Any potential or actual conflict of interest must be declared to the Director immediately.

6. Reporting Concerns

Any suspected bribery, corruption or unethical conduct must be reported to the Director without delay.

Concerns will be treated seriously and confidentially. Individuals raising concerns in good faith will not suffer detriment.

7. Responsibilities

The Director is responsible for:

- Ensuring this policy is implemented and reviewed annually.
- Maintaining appropriate registers and oversight.
- Investigating any reported concerns.

All Associates and contractors are responsible for:

- Acting in accordance with this policy.
- Completing work ethically and transparently.
- Raising concerns where appropriate.

8. Review

This policy will be reviewed annually or in response to legislative or organisational change.

The Director retains overall responsibility for this policy.
This statement will be reviewed and updated every year .

Signed:



Name: LISA MARTIN, MANAGING DIRECTOR OF CARVER COACHING LTD

Dated: January 11th, 2026

Next Review: January 2027