



# Anti Bribery Policy

## 1. Purpose and Scope

Rock School Bus operates on the principle of zero tolerance towards bribery, corruption, fraud, or any other criminal activity. This policy applies to all employees, whether permanent or temporary, to contractors, consultants, agency staff, interns, officers, directors, and to any other individuals or third parties working on behalf of or under the control of Rock School Bus.

Everyone covered by this policy must act with honesty, integrity, and in full compliance with anti-bribery and corruption laws, including the UK Bribery Act 2010. Breaches of this policy are treated extremely seriously and may lead to disciplinary action, including dismissal for gross misconduct, as well as criminal prosecution.

## 2. What is Bribery?

Bribery is the act of offering, giving, requesting, or receiving any reward, benefit, or inducement intended to influence someone's actions improperly, unlawfully, or unethically. A bribe does not need to take the form of cash. It may include gifts, hospitality, entertainment, travel, favours, services, employment opportunities, or promises to act in a way that creates an unfair advantage. The act of offering or requesting a bribe, even if it is never ultimately given or accepted, may be enough to constitute unlawful conduct.

Examples of bribery include offering an excessive gift to win a contract, accepting hospitality that could improperly influence a business decision, or making a small payment to a government official to accelerate a routine procedure.

## 3. What is Corruption?

Corruption is the abuse of entrusted power or position for personal gain. This includes active acts such as bribery and passive acts such as ignoring or failing to prevent corrupt activity. Corruption can manifest in many ways, ranging from obvious payments or favours to more subtle misuse of influence or authority.

## 4. Permitted Activities

Certain limited activities are permitted where they are proportionate, transparent, and carried out in good faith. Modest gifts and hospitality may be acceptable where their purpose is to build legitimate business relationships, enhance the reputation of Rock School Bus, or promote its products and services. Such gestures must be appropriate for the circumstances, not intended to improperly influence decision-making, and approved in advance by the relevant manager or compliance officer.

Examples of acceptable gifts or hospitality may include a modest festive token such as chocolates or wine, a simple working meal with a supplier or client, or branded promotional items such as pens or

umbrellas. By contrast, lavish or extravagant gestures, especially when linked to business negotiations or government officials, are not permitted. All such activity must be recorded in the

Gifts and Hospitality Register and clearly identified as being provided on behalf of Rock School Bus, not in a personal capacity. Cash or cash equivalents, such as gift vouchers, are never permitted.

Reasonable reimbursement of business expenses, such as travel, meals, or accommodation genuinely connected to legitimate business activities, is also permitted. All expenses must be supported by receipts, pre-approved where required, and submitted in line with the company's Expenses Policy. Any payments exceeding reasonable or genuine business costs will not be acceptable and may be treated as bribery.

## **5. Prohibited Activities**

No one covered by this policy may engage in bribery or corruption in any form. This includes the offering or acceptance of facilitation payments, sometimes referred to as "grease payments" or "kickbacks," which are unofficial and unlawful payments made to secure or speed up routine actions. Such payments, whether large or small, are expressly forbidden. Employees must also never allow third parties to engage in such activity on behalf of the business, nor may they threaten or retaliate against any individual who refuses to participate in bribery or who raises concerns about corrupt practices.

## **6. Record Keeping**

Accurate record keeping is fundamental to preventing bribery and corruption. All gifts and hospitality, whether offered or received, must be recorded in the Gifts and Hospitality Register and approved by the relevant manager or compliance officer. All expenses must be fully documented, supported by receipts, and submitted through the approved company processes. Maintaining "off-the-record" accounts or unofficial records of payments is strictly prohibited and may be regarded as an attempt to conceal unlawful behaviour.

## **7. Reporting Concerns**

Rock School Bus encourages and expects employees and associated persons to report in good faith any concerns regarding bribery, corruption, or suspicious behaviour. Concerns may be raised with a line manager, compliance officer, or HR, and may also be reported under the company's Whistleblowing Policy if confidentiality is preferred. The company will always support those who refuse to participate in corrupt activity, even if doing so results in the loss of business opportunities. Retaliation against individuals who raise concerns will not be tolerated and will itself be treated as a disciplinary matter.

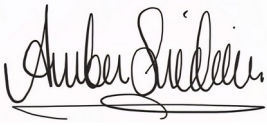
## **8. Consequences of Breach**

Breaches of this policy will be regarded as gross misconduct. Disciplinary action will be taken, which may include dismissal, and in serious cases may also lead to civil or criminal proceedings. Under UK law, individuals may face imprisonment of up to ten years for engaging in bribery, and the company itself may also face significant fines and sanctions if it fails to prevent bribery.

## 9. Policy Management

This policy is not part of any individual's employment contract and may be amended at any time by Rock School Bus. The policy will be reviewed regularly to ensure compliance with legal requirements and industry best practice. All employees are expected to familiarise themselves with this policy and act in accordance with both its wording and spirit at all times.

Signed:

A handwritten signature in black ink, appearing to read 'Amber Sinclair', is written over a light blue rectangular background.

Author Name & Job Title: Amber Sinclair, Director

Date: 01 December 2025

Next Review: Dec 2026