Anti-Bribery and Corruption Policy – October 2026

1. Purpose and Scope

1.1 In-Form Solutions Ltd, a company registered in England and Wales under number 03961045, whose registered office is at 88 Hill Village Road, Four Oaks, Sutton Coldfield, West Midlands B75 5BE ("the Company"), takes a zero-tolerance approach to bribery and corruption. We will not offer, give, ask for or accept a bribe, whoever is involved and wherever we work.

1.2 This Policy explains how the Company complies with the Bribery Act 2010 ("the Act") and related law, including the Economic Crime and Corporate Transparency Act 2023 and the Procurement Act 2023. It also explains how we protect the trust that our NHS, public sector and other clients place in us.

1.3 This Policy applies to everyone who works for or on behalf of the Company: directors, employees, associate consultants, contractors, sub-contractors, agents and anyone else who provides services for us or acts on our behalf ("associated persons"). It applies to all our work, in England, Wales, Jersey, Gibraltar and anywhere else.

1.4 This Policy sits alongside the Company's Gifts and Hospitality Policy, Whistleblowing Policy and Generative AI Usage Policy, and the terms of each client contract. Where a client's rules are stricter, the client's rules apply.

2. What Bribery and Corruption Mean

2.1 A **bribe** is offering, promising or giving anything of value – money, a gift, hospitality, a favour, a job or anything else – to persuade someone to act improperly, or to reward them for having done so. Asking for, agreeing to receive or accepting such a thing is also bribery.

2.2 The Act creates four offences:

- bribing another person;
- being bribed;
- bribing a foreign public official; and
- failure by an organisation to prevent bribery by anyone acting on its behalf. The only defence is for the organisation to show that it had adequate procedures in place to prevent bribery. This Policy is a central part of the Company's procedures.

2.3 **Public officials.** NHS staff, civil servants and local authority staff are public officials, and any advantage offered to them carries a high risk. Officials of the Government of Jersey, Health and Care Jersey, the Government of Gibraltar and the Gibraltar Health Authority count as **foreign public officials** under the Act, because Jersey and Gibraltar are not part of the United Kingdom. Extra care is needed in all dealings with them.

2.4 **Corruption** is the wider abuse of a position of trust for private gain. It includes fraud, false accounting, and hiding or misrepresenting information. The Company does not tolerate any form of corruption or fraud.

3. Consequences

3.1 An individual found guilty of bribery can be sent to prison for up to 10 years and given an unlimited fine.

3.2 An organisation found guilty can be given an unlimited fine. Under the Procurement Act 2023, a supplier involved in bribery or fraud can also be excluded from public contracts and placed on a central debarment list. For a company that works mainly for the NHS and the public sector, this would be extremely serious.

3.3 Since December 2023, a company can be held criminally responsible for bribery, fraud and other economic crimes committed by its senior managers when acting within their authority.

3.4 Any employee who breaches this Policy may face disciplinary action, which may include dismissal. Any associate consultant, contractor or supplier who breaches it may have their engagement ended immediately.

4. Roles and Responsibilities

Role	Responsibility
Policy Owner – John Griffiths, Managing Director	Owns this Policy. Receives reports of concerns, decides what action to take and whether to report to the police, the Serious Fraud Office or a client. Approves agents, introducers and any payment outside normal practice.
Chairman – David Poynton	Approves this Policy. Receives reports where the concern involves the Managing Director.
Registrar – Dawn Bond, Business Manager	Keeps the Hospitality and Gifts Register, the Donation and Sponsorship Register, the Conflicts of Interest Register and training records.
Directors	Lead by example. Approve gifts and hospitality as set out in the Gifts and Hospitality Policy. Make sure due diligence is carried out on associates and suppliers.
All associated persons	Read and follow this Policy, complete training, and report any concern promptly.

5. What You Must Not Do

5.1 No associated person may:

- offer, promise, give, ask for, agree to receive or accept a bribe, or use anyone else to do so;
- make a facilitation payment (see Part 6);
- offer anything to a public official to influence a decision, an approval or a procurement;
- accept anything that could affect, or could look as though it affects, their judgement or the advice they give a client;
- make or accept payments in cash, through unusual routes, or to anyone other than the party entitled to them;
- create false, misleading or incomplete records, invoices, expense claims or timesheets, or keep any “off the books” account; or
- threaten or take action against anyone who refuses to take part in bribery or raises a concern.

6. Facilitation Payments

6.1 A facilitation payment is a small, unofficial payment made to an official to secure or speed up a routine action, such as issuing a permit or clearing paperwork. Facilitation payments are bribes and must not be made, whatever the local custom.

6.2 The only exception is where someone's life, liberty or safety is in immediate danger. Any payment made in those circumstances must be reported to the Policy Owner the same day, or as soon as it is safe to do so.

7. Gifts and Hospitality

7.1 Gifts and hospitality must follow the Company's Gifts and Hospitality Policy, which sets out when approval is needed and how offers are recorded in the Hospitality and Gifts Register.

7.2 **Giving to NHS and public sector staff.** NHS bodies normally require their staff to refuse gifts from suppliers and to declare any hospitality. The Company must not offer gifts to NHS or other public sector staff, other than low-value branded items such as pens or notebooks. Hospitality must be modest and linked to work, such as a working lunch or refreshments at a meeting.

7.3 **Procurement.** No gifts or hospitality may be offered to, or accepted from, anyone involved in a procurement or tender in which the Company is taking part, from the start of the procurement until the contract has been awarded.

7.4 Cash, vouchers, gift cards and anything that can easily be turned into cash must never be given or accepted.

7.5 Gifts and hospitality given or received must be recorded in the Hospitality and Gifts Register, as the Gifts and Hospitality Policy requires.

7.6 Where refusing a gift would cause serious offence, it may be accepted with a Director's approval and then donated to a charity chosen by the Policy Owner.

8. Tenders, Agents and Introducers

8.1 When bidding for work, the Company follows the client's procurement rules. Associated persons must not seek or use confidential information about a procurement, or contact evaluators outside the formal process.

8.2 Agents, introducers or anyone paid a fee or commission for helping the Company win work may only be used under a written agreement approved by the Policy Owner, after due diligence. Fees must be reasonable for the work done and paid into a business bank account in the name of the agent or introducer. No fee or reward may ever be offered to anyone employed by the client.

8.3 Declarations made in tenders, including answers about exclusion grounds under the Procurement Act 2023, must be accurate and approved by the Policy Owner.

9. Conflicts of Interest

9.1 Associated persons must tell the Policy Owner, before starting any assignment, about any personal, financial or family interest that could conflict with the Company's work. This includes any job or role with a client, a competitor or a supplier, including a substantive NHS post held alongside work for the Company.

9.2 Conflicts are recorded in the Conflicts of Interest Register. Where a client requires it, the conflict is declared to the client and the client's decision is followed.

10. Charitable and Political Donations

10.1 Charitable donations and sponsorship may only be given to registered charities and other properly constituted non-profit bodies. They must be recorded in the Donation and Sponsorship Register, proof of receipt must be obtained, and they must never be made in cash.

10.2 No donation or sponsorship may be made at the request of a client, a public official or anyone involved in a procurement, or where it could look like a reward or an inducement.

10.3 The Company does not make political donations and is not affiliated with any political party or campaigning organisation. Associated persons may make personal donations, provided these are not made on the Company's behalf or to gain any business advantage.

11. Due Diligence and Warning Signs

11.1 Before engaging an associate consultant, contractor or supplier, the Company carries out checks proportionate to the risk. Every consultancy agreement includes a requirement to comply with the Bribery Act 2010 and this Policy.

11.2 The following warning signs must be reported to the Policy Owner:

- work outside the United Kingdom, particularly where there are known corruption risks;
- requests for payment in cash, to a third party, to an overseas account or split across several invoices;
- requests for unusually high fees, commissions or "success fees", or for fees that are not clearly explained;
- anyone involved in a procurement asking for a favour, a job, work experience or work for a relative or friend;
- a client or official asking the Company to use a particular person or supplier;
- reluctance to put terms in writing or to provide proper invoices; and
- gifts or hospitality from a supplier hoping to win work from the Company.

12. Records and Financial Controls

12.1 The Company keeps accurate and complete accounts. All payments are made only against proper invoices, to a business bank account in the name of the supplier. Expense claims must be supported by receipts.

12.2 Invoices and timesheets must reflect the work actually done. Compliance with this Policy is checked as part of the Company's ISO 9001 internal audits.

13. Reporting Concerns

13.1 If you are offered, asked for or suspect a bribe, or have any other concern under this Policy, refuse, make a note of what happened and report it to the Policy Owner the same day. If the concern involves the Policy Owner, report it to the Chairman. Associates may also report through their usual contact at the Company.

13.2 Concerns can be raised under the Whistleblowing Policy. No one will suffer any detriment for refusing to take part in bribery or for raising a concern honestly, even if it turns out to be mistaken.

13.3 Independent, confidential advice is available from Protect, the whistleblowing charity (protect-advice.org.uk).

14. Training and Communication

14.1 This Policy is available to all associated persons at any time on request from the Registrar, and they are responsible for reading it. All associated persons complete anti-bribery training at induction and a short refresher every year. The Registrar keeps a record of who has completed it.

14.2 The Company's zero-tolerance approach is made clear to clients, associates and suppliers, including in tenders, proposals and contracts.

15. Monitoring and Review

15.1 The Policy Owner reviews the Company's bribery and fraud risks at least once a year, as part of the management review.

15.2 This Policy will be reviewed every 12 months, or sooner if the law, a client requirement or the Company's work changes.

This Policy has been approved and authorised by:

Name:	David Poynton
Position:	Chairman
Date:	29th October 2026
Signature:	
Issue:	Issue 3 (replaces Issue 2, 26 May 2023)
Next review:	October 2027