

# Anti-Bribery and Corruption Policy

Webjects Limited – compliance with the Bribery Act 2010

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**COMPANY** Webjects Limited (10521644)

**VERSION** 1.0

**ADOPTED** September 2025

**REVIEW CYCLE** Annually – each September

**NEXT REVIEW** September 2026

**APPROVED BY** Chris Gardner, Director

**LEGISLATION** Bribery Act 2010

## PURPOSE

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This policy sets out how Webjects Limited prevents bribery and corruption in everything we do. It explains the law we work to, the standards we expect of everyone connected with the business, and what to do if something does not look right.

Bribery and corruption are criminal offences. They damage trust, distort fair competition, and can expose the company and individuals to prosecution. As a supplier to councils, charities, schools and other publicly-funded bodies, we treat this duty seriously. This policy gives our people and our partners a clear, practical standard to follow.

## SCOPE

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This policy applies to everyone who acts for or on behalf of Webjects Limited:

- the directors;
- associates, contractors and freelancers we engage;
- and anyone who performs services for us or in our name, including suppliers and agents where they are acting on our behalf.

It applies to all our work, in the UK and anywhere else we operate, and whether dealing with the private sector or the public sector. Where we engage a third party to act for us, we expect them to meet standards consistent with this policy, and we make that expectation clear when we appoint them.

## POLICY STATEMENT

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**Zero tolerance:** Webjects Limited does not give, offer, promise, request, agree to receive or accept bribes — in any form, in any place, for any reason. We compete and win work on the quality and value of what we do, never by improper advantage.

Bribery means offering, giving, requesting or accepting a financial or other advantage to bring about the improper performance of a function or activity, or to reward it. It does not matter whether the advantage is offered directly or through someone else, whether it is large or small, or whether the business is won or lost as a result. The conduct itself is what counts.

We are a small UK digital agency. By the nature of our work, our exposure to bribery is **low**: we do not operate in high-risk territories or sectors, we do not use sales agents or intermediaries to win contracts, and we do not handle the kinds of large public procurements where corruption risk typically arises. We do not treat that low risk as a reason to do nothing. We maintain procedures to prevent bribery that are honest and proportionate to our size and the risks we actually face — no more, and no less.

## RESPONSIBILITIES

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**The Director** is responsible for this policy — owning the company's commitment to doing business without bribery, keeping the policy up to date, overseeing the gifts and hospitality register, and acting as the point of contact for any question or concern, at [info@webjects.co.uk](mailto:info@webjects.co.uk).

**Everyone within scope** is responsible for:

- reading and following this policy;
- never offering, accepting or turning a blind eye to a bribe;
- raising a concern promptly if they are unsure about a gift, a payment or a request, or if they suspect bribery; and
- keeping honest, accurate records of any gifts or hospitality given or received in connection with our work.

No one will be penalised for refusing to pay or accept a bribe, even if it means the company loses business or suffers a delay. The company will support that decision.

## WHAT THIS MEANS IN PRACTICE

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We follow the six principles for preventing bribery set out in the Ministry of Justice guidance under the Bribery Act 2010, scaled to our size:

1. **Proportionate procedures.** Our procedures fit a very small company with a low risk profile. This policy, an open culture, director oversight and a simple gifts and hospitality register are the core of them. We do not bolt on bureaucracy that adds no real protection.
2. **Top-level commitment.** The directors set the tone. We make clear, internally and to clients, that we will not win or keep work through bribery, and we back the people who uphold that.
3. **Risk assessment.** We think about where bribery risk could arise — for example tendering for public-sector contracts, or engaging a new associate or supplier — and we keep that judgement under review as the business changes.
4. **Due diligence.** Before we take on associates, contractors or significant suppliers, we satisfy ourselves they are reputable and will act with integrity on our behalf.
5. **Communication and training.** Everyone within scope is given this policy and is expected to understand it. The director briefs new associates and contractors on it, and is available to talk through any grey area.
6. **Monitoring and review.** We keep the gifts and hospitality register, watch how the policy works in practice, and review it formally each year (see Monitoring and Review).

### Gifts and hospitality

Modest, genuine business courtesies are a normal part of working life and are not prohibited. The test is simple: a gift or hospitality is acceptable only if it is **reasonable, proportionate, given openly, and recorded** — and never if it is intended to influence a decision or could reasonably be seen that way.

Use this as a guide:

USUALLY ACCEPTABLE	NEVER ACCEPTABLE
A working lunch or coffee with a client or supplier	Cash, or a cash equivalent such as a gift card or voucher
A bottle of wine, branded items, or a small seasonal gift	Anything offered or accepted around the time of a tender, bid or contract decision
A reasonable invitation to an industry event, conference or networking dinner	Anything lavish, or out of proportion to a normal business relationship
Promotional spend that is open and clearly tied to legitimate business	A gift or favour given on the understanding that something is expected in return

If you are unsure whether something is appropriate, treat that doubt as your answer: decline it, or ask the Director before accepting or offering it.

**The register.** We keep a simple gifts and hospitality register — a shared spreadsheet is enough for a company our size. For anything beyond trivial, record: the date, who gave and who received it, a description, an approximate value in £ sterling, and the business reason. The director reviews the register periodically.

### Facilitation payments

Facilitation payments — small unofficial payments to speed up or secure a routine action someone is already supposed to perform — are **bribes under the Bribery Act 2010 and are strictly prohibited**. There is no exception for them in UK law, however small or however common they may be elsewhere. Webjects does not make them and will not reimburse them.

### Charitable and political donations

We may make genuine charitable donations, and we keep a record of them. We will not make a donation that is, or could appear to be, a way of obtaining or rewarding a business advantage.

**Webjects does not make political donations** of any kind.

## HOW TO RAISE A CONCERN

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If you suspect bribery or corruption, or you are simply unsure whether something is proper, raise it **early** — before acting, wherever possible.

- **Speak to the Director** in person, by phone, or by email at **info@webjects.co.uk**.
- Set out what you have seen or been asked to do, and any relevant detail. You do not need to be certain, and you do not need proof — an honest concern is enough.
- Concerns are taken seriously, looked into properly, and kept confidential as far as possible.

No one who raises a genuine concern in good faith will suffer any disadvantage for doing so, even if it turns out to be mistaken. If you believe wrongdoing is not being addressed, you can report it to the relevant authority — for example **Action Fraud** (the UK's national reporting centre for fraud and economic crime) or the **National Crime Agency**. Genuine disclosures about this kind of wrongdoing may qualify for protection under whistleblowing law.

## CONSEQUENCES OF A BREACH

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Bribery is a serious criminal offence with serious consequences:

- **For individuals** — conviction can mean up to **10 years' imprisonment, an unlimited fine, or both**.
- **For the company** — an **unlimited fine**, alongside lasting damage to our reputation and our ability to work with public-sector and other clients.

Anyone within scope who breaches this policy faces action appropriate to their relationship with the company. For an associate, contractor or supplier, that includes ending the engagement or contract. For a director, it is a matter for the board. Where the law has been broken, the company will report the matter to the appropriate authorities and co-operate fully with any investigation.

## MONITORING AND REVIEW

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The Director monitors how this policy works in practice, including through the gifts and hospitality register and any concerns raised. This policy is reviewed **annually, each September**, and sooner if the law changes, our risk profile changes, or an incident shows the policy needs to be strengthened. The Director approves each version.

## LEGAL FRAMEWORK

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This policy is made under, and should be read alongside, the following UK legislation and guidance:

- **Bribery Act 2010** — the primary legislation. It creates the offences of bribing another person (section 1), being bribed (section 2), bribing a foreign public official (section 6), and the corporate offence of failing to prevent bribery committed by an associated person (section 7). A commercial organisation has a defence to the section 7 offence if it can show it had **adequate procedures** in place to prevent bribery. See [legislation.gov.uk/ukpga/2010/23](https://legislation.gov.uk/ukpga/2010/23).
- **The Bribery Act 2010 — Guidance** (Ministry of Justice, issued under section 9), which sets out the six principles of adequate procedures this policy follows. See [gov.uk/government/publications/bribery-act-2010-guidance](https://www.gov.uk/government/publications/bribery-act-2010-guidance).
- **Criminal Finances Act 2017** — creates the corporate offences of failing to prevent the criminal facilitation of UK tax evasion (section 45) and foreign tax evasion (section 46), with a defence of having **reasonable prevention procedures**. Webjects maintains procedures proportionate to its size and low risk to address this duty, set out in full in our separate **Anti-Facilitation of Tax Evasion Policy**. See [legislation.gov.uk/ukpga/2017/22](https://legislation.gov.uk/ukpga/2017/22).

· Enforcement in the UK is led by the **Serious Fraud Office** and the **Crown Prosecution Service**, with reports made through **Action Fraud** and the **National Crime Agency**.

*The Bribery Act 2010 sets the minimum legal standard. Where this policy asks for more than the law strictly requires of a company our size, that is a deliberate choice to do business to a higher standard.*

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