

## Document Control Page

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## **YPO Anti-Bribery Policy Statement of Intent 2025**

YPO has a zero tolerance approach to bribery as defined by the Bribery Act 2010. We also have a zero tolerance approach to corruption and other financial crime and uphold all laws relating to such crimes, in the UK and the jurisdictions we do business in.

YPO is committed to ensuring its business is conducted in accordance with the law and proper standards; that public money is safeguarded and properly accounted for; that funds are used economically, efficiently, and effectively; and that we conduct business openly, transparently and ethically.

YPO expects everyone who works for and on behalf of the organisation to comply with the law; to maintain the highest standards of conduct; and to ensure that their actions and decisions are not influenced by, or may be perceived to be influenced by, the offer or acceptance of inducements or rewards. This applies to all employees, elected members, and “associated parties” including, but not limited to distributors, agents, consultants, contractors, and suppliers who act for or on behalf of, or otherwise represent, YPO.

YPO is the largest formally constituted local authority purchasing consortium in the UK. We provide a professional procurement service supplying products and services to a wide range of public sector customers. We supply goods and services to the private sector via YPO Supplies Ltd and to overseas markets via international distributors.

We recognise that the nature of our business means we have a significant exposure to the risk of bribery and corruption. We have put robust arrangements in place to identify and manage this risk and to ensure compliance with UK law and Ministry of Justice Guidance. We demonstrate this by:

- Creating an organisational culture where bribery is not tolerated: a clear message is sent from the top of the organisation (YPO Management Committee and Board) that offering, giving, soliciting or accepting a bribe is unacceptable. Policies, awareness raising and training are in place to ensure everyone understands this message.
- Putting in place proportionate controls to deter, prevent and detect bribery, corruption and other financial crime, including the means to report suspicions or evidence of such activity without fear of recrimination.
- Committing to report and fully investigate, in co-operation with external agencies, such as Internal Audit, Action Fraud and the Police, all allegations or suspicions of bribery
- Sanctioning those guilty of committing an offence. Employees may face disciplinary action. We will not do business, or will cease to do business, with associated parties where there is evidence of improper or criminal activity. We will co-operate with the police and justice system in the prosecution of offenders.
- Seeking redress, where appropriate.

## **Bribery**

YPO has adopted the definition of bribery given in the UK Bribery Act 2010, that came into force from 1<sup>st</sup> July 2011, and the supporting Ministry of Justice (MoJ) six guiding principles.

Bribery is defined as offering, promising or giving someone a financial or other advantage to bring about their improper performance, or to reward them for already doing so.

Improper performance means not acting in good faith, impartially or in accordance with a position of trust. This may give commercial, contractual, regulatory or personal advantage.

The Act creates four offences:

- Active bribery: offering, promising or giving a bribe (Section 1)
- Passive bribery: requesting, agreeing to receive or accepting a bribe (Section 2)
- Bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business (Section 6)
- Corporate liability for failing to prevent bribery on behalf of a commercial organisation (Section 7)

## **Facilitation Payments**

Facilitation payments are payments made to induce officials to perform routine functions they are otherwise obliged to perform. They are bribes and are not exempt under the Act. Legally required administrative fees and fast-track services are not facilitation payments.

YPO prohibits the offer, solicitation, acceptance, or receipt of facilitation payments.

## **Hospitality, Promotional and other Business Expenditure**

The Act recognises that genuine hospitality, similar promotional or business expenditure can be an important part of doing business and does not seek to criminalise it, provided that it is proportionate and reasonable to the business. However, it also recognises that such expenditure can be employed as bribes. If the authorities thought that hospitality was a cover for bribery, they would look at the level of hospitality offered or accepted; the way in which it was provided; and the level of influence the person receiving it had on the business decision in question.

YPO publishes a Gifts & Hospitality Policy that sets out our rules for offering, accepting, declining and declaring gifts and hospitality and guidance for employees on how to comply with the policy. Compliance is reviewed and reported on a regular basis.