



HITRANS **ANTI-BRIBERY POLICY**

(Covering all employees and Board Members)



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1. Introduction

- 1.1** HITRANS is committed to maintaining the highest standards of integrity in its operations and dealings. We recognize that bribery and corruption undermine business ethics, fair competition, and the reputation of the organization. In alignment with this commitment, we uphold all applicable anti-bribery laws, including the UK Bribery Act 2010 and any other relevant legislation.
- 1.2** Bribery in any form will not be tolerated. Employees and anyone acting on behalf of HITRANS must adhere to our zero-tolerance stance on bribery, and any substantiated violations will lead to disciplinary action, including dismissal, where applicable.
- 1.3** This Policy provides essential principles and guidelines to ensure HITRANS complies with legal requirements and operates ethically. Employees have a shared responsibility to follow these principles, ensuring that bribery and corruption do not take place within the organization.
- 1.4** This Policy should be read alongside HITRANS's Anti-Bribery Procedures, Anti-Fraud and Corruption Policy, and the Employee Code of Conduct.
- 1.5** Employees are encouraged to report concerns of bribery or corruption and provided with guidance on how to handle these situations.

2. Scope

- 2.1** This Policy applies to all employees of HITRANS and covers all activities, whether business-related or personal, that may have an impact on the organization.
- 2.2** In our dealings with third parties, contractors, and external partners, HITRANS will encourage the adoption of practices consistent with this anti-bribery policy.

3. Compliance

- 3.1** All employees must confirm that they have read, understood, and agreed to comply with this Policy at the point of employment, with an annual confirmation thereafter.
- 3.2** Non-compliance with this Policy may lead to disciplinary action, including dismissal, depending on the severity of the violation.



4. What is Bribery?

- 4.1** Bribery involves offering, giving, receiving, or soliciting anything of value to influence the actions of a person or organization, for the purpose of gaining a personal, commercial, regulatory, or contractual advantage.
- 4.2** Bribes can take many forms, including money, gifts, services, or hospitality.
- 4.3** Bribery is a criminal offense under the Bribery Act 2010 and other relevant laws, with penalties ranging from imprisonment to unlimited fines.
- 4.4** HITRANS will ensure that it takes reasonable steps to prevent bribery, and failure to do so may expose the organization to legal liability.

5. HITRANS Position on Bribery

- 5.1** HITRANS strictly prohibits employees and anyone acting on behalf of the organization from offering, accepting, or engaging in bribery or unlawful inducements.
- 5.2** Using intermediaries, such as third-party agents or consultants, to facilitate bribery is also prohibited.
- 5.3** HITRANS is committed to preventing bribery by:
- Establishing appropriate controls and procedures to reduce bribery risks.
 - Educating and training employees on the risks of bribery and how to avoid them.
 - Encouraging employees to report concerns about bribery or corruption.
 - Investigating and acting on instances of suspected bribery.
 - Enforcing strong disciplinary measures against employees involved in bribery.
 - Including anti-bribery clauses in employee contracts and commercial agreements.

6. Preventing Bribery – Adequate Procedures

- 6.1** To comply with the Bribery Act 2010, HITRANS must ensure it has implemented “adequate procedures” to prevent bribery. The adequacy of procedures will depend on the organization’s size, risks, and complexity.
- 6.2** HITRANS’s anti-bribery measures are based on six key principles as recommended by the UK government:
- **Top-Level Commitment:** HITRANS leadership demonstrates a commitment to preventing bribery.
 - **Risk Assessment:** HITRANS will regularly assess bribery risks across its operations.
 - **Proportionate Procedures:** Anti-bribery procedures will be proportionate to the identified bribery risks.
 - **Due Diligence:** Third parties and business partners will be subject to thorough due diligence processes.
 - **Communication:** Anti-bribery policies will be communicated to all employees, contractors, and partners.
 - **Monitoring and Review:** HITRANS will continuously monitor and review its anti-bribery procedures to ensure effectiveness.
- 6.3** The Anti-Bribery Procedure offers detailed guidance on how to assess and mitigate bribery risks, aligning with the six principles outlined above.



7. Employee Responsibilities

- 7.1** Employees must read and understand this Policy and the related Anti-Bribery Procedure and seek advice if unsure about any situations that might involve bribery.
- 7.2** All employees are responsible for:
- Complying with this Policy.
 - Avoiding actions or behaviours that might lead to or suggest bribery.
 - Seeking advice before accepting gifts or hospitality.
 - Reporting any concerns or suspicions about potential bribery or corruption.
- 7.3** Employees must not:
- Offer, give, or accept bribes, gifts, or hospitality with the intention of gaining an unfair advantage.
 - Engage in bribery through third parties or intermediaries.
 - Accept bribes from others, regardless of the form (monetary or otherwise).
- 7.4** If employees are unsure about the appropriateness of a situation, they should consult with their line manager or the designated ethics officer.

8. Consequences of Improper Behaviour

- 8.1** Any allegations of bribery will be investigated thoroughly and may lead to disciplinary action, up to and including dismissal.
- 8.2** HITRANS will report all instances where criminal behaviour may have occurred to the relevant authorities.
- 8.3** Where financial losses are incurred due to bribery, HITRANS will pursue recovery actions, where possible.

9. Gifts & Hospitality

- 9.1** Gifts, hospitality, or favours, particularly those that may influence or appear to influence business decisions, may be construed as bribes.
- 9.2** Employees must exercise caution when offering or accepting gifts or hospitality and should always consider the potential for any conflict of interest.
- 9.3** Small, token gifts or hospitality may be appropriate, but employees should always seek approval from their manager before accepting or offering anything of value.
- 9.4** All gifts or hospitality beyond small, token items should be recorded in the Gifts and Hospitality Register to ensure transparency.

10. Review

- 10.1** This Policy and the associated Anti-Bribery Procedure will be reviewed regularly to reflect organizational changes, legislative updates, and evolving best practices in anti-bribery and corruption prevention.
- 10.2** HITRANS will make amendments as necessary to ensure that its approach to bribery remains effective and aligned with the highest standards of corporate governance.

Policy Reviewed and Updated on 2 April 2025.

This updated Anti-Bribery Policy is effective from 7 April 2025.

This policy will be reviewed by 30 April 2030.





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