BINA PATHWAYS

Anti bribery corruption and gifts

BP-PUB-12-20261106-v1 | Owner: Directors | Review by 6 November 2027 or earlier on material change

Standard

We prohibit bribes, kickbacks, facilitation payments and dishonest procurement. This applies to permanent and temporary staff, directors, representatives and suppliers acting for Bina. Commercial targets never justify a false reference, forged certificate, false invoice or payment to secure improper influence.

Gifts and conflicts

Declare gifts, hospitality, personal relationships and supplier interests before a decision. No cash or cash equivalent is accepted as a business inducement. During a tender or active purchasing decision, decline hospitality intended to influence the outcome. Modest transparent hospitality requires advance uninvolved director approval and a recorded purpose and value.

Checks and records

Choose providers against suitability, lawful compliance, safety, quality and price. Use clear invoices and payment authority, independently verify changed bank details and retain receipts. A person cannot approve their own conflicted decision. Record related parties and follow company articles and delegated authority.

Reporting

Raise a concern through admin@binapathways.co.uk or 07337 541218 and request the uninvolved director. Appropriate external reporting and legal advice remain available. Refusing or reporting a bribe must not result in retaliation. Make safe, preserve messages and records and do not promise an outcome before investigation.

Response and oversight

An uninvolved reviewer assesses facts, restrictions, legal advice and any external referral; allegations are handled fairly. Directors record sanctions or supplier action where justified, corrective controls and lessons. Review the gifts and conflicts register quarterly and the policy annually.

Related controlled procedures: Governance manual sections 1 4 and 14; Whistleblowing policy. Use Operational Action Guide BP-ACT-2026-11-06-v1 for the responsible person, action, deadline, escalation and record. Accessible copies: admin@binapathways.co.uk or 07337 541218.