

Anti-Bribery and Anti-Corruption Policy Statement

Federation of Window Cleaners

2.1 The Federation of Window Cleaners is committed to conducting its business ethically, honestly, and with integrity. We are committed to implementing and maintaining effective measures to prevent bribery in all areas of our operations.

The Federation of Window Cleaners operates a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

2.2 The Federation of Window Cleaners will comply with all applicable anti-bribery and anti-corruption laws in every jurisdiction in which it operates. We are bound by UK legislation, including the Bribery Act 2010, in relation to our conduct both in the UK and overseas.

2.3 The Federation of Window Cleaners recognises that bribery and corruption are serious criminal offences that may result in imprisonment, substantial fines, exclusion from public procurement opportunities, and significant reputational damage. We therefore take our legal and ethical responsibilities seriously and are committed to preventing bribery and corruption throughout our organisation.

3. Who is covered by this policy?

3.1 This policy applies to all employees, whether temporary, fixed-term, or permanent, as well as consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, and any other persons associated with us, including third parties, wherever they are located. It also applies to officers, trustees, board members, and committee members at every level.

3.2 For the purposes of this policy, a third party is any individual or organisation with whom we come into contact in the course of our work. This includes actual and prospective clients, customers, suppliers, distributors, business contacts, agents, advisers, and government or public bodies, together with their advisers, representatives, and officials.

3.3 Any arrangements entered into with third parties must be supported by clear contractual terms, including appropriate provisions requiring compliance with this policy and with applicable anti-bribery and anti-corruption laws.

4. Definition of bribery

4.1 Bribery is the offering, giving, promising, requesting, agreeing to receive, receiving, accepting, or soliciting of anything of value or any other advantage in order to influence a decision or secure an improper benefit.

4.2 A bribe may include any inducement, reward, payment, gift, hospitality, or other item of value offered to obtain a commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to offering a bribe. An individual who requests, receives, or accepts a bribe is also acting unlawfully.

4.4 Bribery is illegal and strictly prohibited. No employee or associated person may engage in any form of bribery, whether directly, indirectly, or through a third party such as an agent or distributor. Bribes must never be offered to foreign public officials. Bribes must not be accepted in any circumstances. If there is any uncertainty as to whether a payment, gift, or act of hospitality may be improper, advice must be sought from the appropriate responsible manager before any action is taken.

5. What is and is not acceptable

5.1 This section addresses four key areas: gifts and hospitality, facilitation payments, political contributions, and charitable contributions.

5.2 The Federation of Window Cleaners may give or receive reasonable and proportionate gifts and hospitality only where doing so is lawful, appropriate, and consistent with good business practice. Any such gift or hospitality must meet all of the following requirements:

- a.** It must not be offered, given, or received with the intention of influencing a decision, securing or retaining business, obtaining a business advantage, or rewarding a person for doing so.
- b.** It must not create, or appear to create, an obligation for a return favour or benefit.
- c.** It must comply with all applicable laws and regulations.
- d.** It must be given or received in the name of the organisation rather than in a personal capacity.
- e.** It must not include cash or cash equivalents, such as vouchers or gift certificates.
- f.** It must be appropriate to the circumstances, modest in nature, and consistent with accepted business practice.
- g.** It must be of an appropriate type and value, and given or received at an appropriate time, taking into account the reason for it.
- h.** It must be given and received openly and transparently, and never in secret.
- i.** It must not be offered selectively to any person in a position of influence with the intention of improperly influencing that person.
- j.** It must not exceed any value threshold set by the organisation from time to time.
- k.** It must not be offered to, or accepted from, any government official, public representative, politician, or political party without prior approval from the appropriate responsible manager.