

# Anti-Bribery and Corruption Policy

Wrexham BID Ltd | Company No. 16536873

Last Updated: February 2026

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## 1. Purpose and Scope

Wrexham BID Ltd is committed to conducting all of its activities with the highest standards of honesty, integrity, and ethical behaviour. This policy sets out our zero-tolerance approach to bribery and corruption in all its forms, in compliance with the Bribery Act 2010.

This policy applies to all Board members, employees, contractors, consultants, agents, and any other person acting on behalf of Wrexham BID Ltd. It covers BID activities in the UK and any international engagements.

## 2. What is Bribery?

Bribery involves offering, promising, giving, accepting, or soliciting a financial or other advantage to induce or reward improper conduct, or to influence a person in the performance of their duties. Bribery can take many forms, including:

- Cash payments or gifts intended to influence a decision.
- Excessive hospitality or entertainment offered to, or received from, suppliers or public officials.
- Kickbacks in procurement processes.
- Facilitation payments made to expedite routine processes.

Under the Bribery Act 2010, bribery is a criminal offence. An organisation can also be liable for the offence of **failing to prevent bribery** committed by a person associated with it, unless the organisation can demonstrate it had adequate procedures in place to prevent bribery. This policy, alongside our Finance and Procurement Policy, forms part of those procedures.

## 3. Gifts and Hospitality

The BID recognises that reasonable, proportionate hospitality is a normal part of business relationships. However, gifts and hospitality must never be offered or received with the intention — or appearance — of influencing a business decision. The following thresholds apply:

Situation	Rule
Gifts received under £25 in value	Acceptable if unsolicited and properly declared to the BID Manager.
Gifts received over £25 in value	Must be declined or, if unavoidable, declared and recorded in the Gifts and Hospitality Register. May be donated to a local charity.
Hospitality received (e.g., meals, events)	Modest and proportionate hospitality is acceptable. Lavish hospitality must be declined or declared and approved in advance by the Chair.
Gifts or hospitality offered to third parties	Must be proportionate, transparent, and approved by the BID Manager. Must never be offered to public officials or in connection with a procurement decision.

The BID Manager is responsible for maintaining a **Gifts and Hospitality Register**. All declarations must be recorded promptly and reviewed by the Chair.

#### 4. Procurement and Conflicts of Interest

The greatest risk of bribery in a BID context arises in procurement. All procurement activity must comply with the Finance and Procurement Policy. In particular:

- No BID employee or Board member may accept any payment, gift, or benefit from a supplier or potential supplier in connection with a procurement decision.
- Any conflict of interest in a procurement process must be declared and managed in accordance with the Conflict of Interest Policy.
- All contracts must be awarded on the basis of objective, documented criteria.

#### 5. Responsibilities

- **The Board** is responsible for approving this policy and overseeing its implementation.
- **The BID Manager** is the Anti-Bribery Officer and is responsible for maintaining the Gifts and Hospitality Register, investigating any concerns raised, and ensuring staff are trained on this policy.
- **All staff and Board members** must comply with this policy, complete any required training, and report any concerns promptly.

#### 6. Raising Concerns

Any person who suspects bribery or corruption involving Wrexham BID Ltd, its staff, Board members, or contractors should report their concern immediately. Concerns may be raised:

- To the BID Manager (unless the concern involves the BID Manager, in which case directly to the Chair).
- To the Chair of the Board.
- Anonymously through the BID's Whistleblowing Policy.

All reports will be investigated promptly, confidentially, and in accordance with the Whistleblowing Policy. No person who raises a genuine concern in good faith will be subject to any detriment as a result.

#### 7. Consequences of Breach

Any breach of this policy by a BID employee will be treated as a serious disciplinary matter and may result in dismissal. Board members found to have breached this policy may be required to resign. Where there is evidence of criminal conduct, the matter will be referred to the appropriate authorities. Contractors who breach this policy may have their contracts terminated.

#### 8. Record Keeping and Audit

The BID will maintain a Gifts and Hospitality Register and ensure that all procurement records are retained in line with the Finance and Procurement Policy. These records are available for inspection by the Board and, where required, by external auditors.

## 9. Training

All BID staff and new Board members will receive training on this policy as part of their induction. A refresher will be provided at least every two years, or following any significant change in the BID's activities or this policy.

## 10. Review

This policy will be reviewed annually by the Board. Any concerns about its adequacy or implementation should be raised with the Chair.

Chair, Wrexham BID Ltd	BID Manager, Wrexham BID Ltd
Signed: _____ Name: _____ _____ Date: _____ _____	Signed: _____ Name: _____ _____ Date: _____ _____