

DOGWOOD PRODUCTIONS CIC

ANTI-BRIBERY POLICY

Dogwood Productions is a Community Interest Company and referred throughout simply as “Dogwood”.

We are committed to reviewing our Anti-Bribery Policy regularly. This policy was last reviewed: November 2025

This document, and any supporting documents, are accessible to staff, including freelance staff and those contracted on a short-term basis.

This policy is an active document and will be monitored and reviewed regularly to ensure it remains fit for purpose and in line with current legislation and guidance.

Primary Aims

Dogwood is committed to conducting its business with the highest standards of ethics, integrity, and compliance with the law. This Anti-Bribery and Anti-Corruption Policy outlines its stance on bribery and corruption. It applies to all employees, contractors, directors, agents, and third-party intermediaries and is in line with the UK Bribery Act 2010 and other applicable local and international anti-corruption laws.

Definitions and Response

Dogwood will comply with the UK Bribery Act 2010, as well as all other relevant local and international anti-corruption laws. The UK Bribery Act criminalizes the offering or receiving of bribes, including both public and private sector corruption, and provides for severe penalties for non-compliance.

Those engaged by the company in any capacity must ensure that their actions align with the principles of the UK Bribery Act 2010, including avoiding offering or receiving bribes, preventing bribery within the company's supply chain, and maintaining accurate financial records.

The purpose of this policy is to:

- Provide clear guidelines for identifying and preventing bribery and corruption.
- Ensure compliance with the UK Bribery Act 2010, as well as any relevant international anti-corruption regulations.
- Protect Dogwood's reputation and assets, and safeguard those we work with from the consequences of unethical business practices.
- Foster a corporate culture of transparency, accountability, and ethical decision-making.

Bribery

Bribery refers to offering, giving, soliciting, or receiving anything of value to influence the outcome of business decisions or secure an improper advantage. This includes but is not limited to:

- Direct Bribes: Offering or receiving money or something of value to induce or reward improper conduct.
- Indirect Bribes: Offering or receiving a bribe via a third party (e.g., a consultant, agent, family member).

Bribery is prohibited in all circumstances, whether it involves gifts, payments, entertainment, or promises of employment.

Kickbacks

Kickbacks involve offering or receiving something of value in exchange for favourable treatment or to facilitate improper conduct. Dogwood strictly prohibits kickbacks in any form.

Improper Influence on Public Officials

Public officials are individuals employed by or representing government agencies, public international organisations, state-owned enterprises, and other similar bodies.

Dogwood produces live theatre and workshop activity and is dependent upon grant funding. It is important to the success of seeking provision that local authorities and non-governmental organisations fully understand the scope and direction of its work. This is achieved through a combination of detailed applications and the monitoring of both outputs and outcomes. In doing so, we would expect to offer access to our activity to both elected and non-elected officials, so that formal or informal evaluation can take place upon which they can offer an informed view of present and future support. We would not expect to make a charge for such access and the individuals attending through this route might be expected to be governed by their organisation's own anti-bribery policies.

Offering gifts, hospitality, or anything of value to public officials outside of the requirements indicated above in order to influence decisions or secure a business advantage is prohibited.

Third-party Liability

Dogwood might be held accountable for any bribery, kickbacks, or other corrupt activities carried out by third parties on its behalf. Where appropriate, it will seek to ensure that agents, contractors, and consultants comply with the approaches defined in this policy.

Acceptable Business Practices

Dogwood acknowledges that gifts, meals, and hospitality can be part of normal business relationships. However, such practices must not be used to improperly influence a business decision or violate anti-bribery laws. Any gifts, meals, or hospitality provided or received must:

- Be modest, reasonable, and appropriate in value.
- Have a legitimate business purpose.
- Not be given with the intention of gaining an improper business advantage.
- Be disclosed.
- Comply with the UK Bribery Act 2010 and any other local laws.

Reporting Violations and Whistleblower Protection

All those engaged in working with Dogwood in any capacity must report any suspected or actual violation of this policy to the nominated Company Secretary. They can do so without fear of retaliation, as long as the report is made honestly and in good faith, under Dogwood's Whistleblowing Policy.

They should be aware of and report any of the following red flags regarding third-party relationships:

- Unusual or suspicious payments or invoices, including large, unexplained commissions or lump sum payments.
- A close or suspicious relationship between the third party and a public official.
- Requests for payments to be made to third-party accounts in foreign jurisdictions with no clear business justification.

The company will continue to raise awareness about anti-bribery and anti-corruption issues through regular communications, training, and updates on legal and regulatory requirements.

Record-keeping and Internal Controls

The company is required to maintain accurate financial records and a system of internal controls that allow for the detection of bribery or corruption. Those engaged by it must ensure that all business records, including invoices, receipts, and expense reports, reflect the true nature of transactions and are properly approved and documented.