
COMPANY POLICY

Conducting Business with Integrity

Policy owner	Kevin Buchler, Founder & Managing Director, CoolPath Ltd
Applies to	CoolPath directors and staff, and every college, manufacturer, network partner and finance-referral relationship
Effective date	August 2026
Next review	August 2027, or sooner following a material change in law, scale or activity

1. Purpose and Scope

CoolPath sits at the centre of relationships with government funding bodies, colleges, manufacturers, distributors, network technician partners and asset finance providers. Its value to every one of those relationships depends on being demonstrably trustworthy. This policy sets out the standard of integrity CoolPath applies to all of them, in line with the Bribery Act 2010.

2. Policy Statement

CoolPath has zero tolerance for bribery, facilitation payments, or improper inducements offered or received in exchange for a Registry listing, a funding referral, or an introduction to a manufacturer or distributor. Commission and referral fee structures are transparent and disclosed to the paying party in every case; nothing is charged for a Registry listing itself, since that would undermine the credibility the Registry exists to provide.

3. Key Provisions

- A gifts and hospitality register is maintained for anything offered or received above a nominal value (guideline: £50).
- No payment, in cash or in kind, may be accepted in exchange for a Registry listing, placement, or introduction.
- Directors and staff must declare any personal or financial interest in a partner college, manufacturer, distributor or finance provider before that relationship is entered into or renewed.
- New network partners and finance-referral counterparties are subject to basic due diligence before onboarding, including confirmation of REFCOM-aligned standing where relevant.
- A confidential route exists for staff, candidates or partners to raise a concern without fear of reprisal.
- Records of funding claims, grant use, and commission calculations are kept accurate and available for audit by government funding partners.

4. Roles and Responsibilities

The Founder & Managing Director is accountable for this policy and for reviewing the gifts, hospitality and conflicts register. Every Technician Network Partner Agreement and manufacturer or college partnership agreement incorporates this policy by reference.

Approved and signed on behalf of CoolPath Ltd:



Kevin Buchler

Founder & Managing Director, CoolPath Ltd

Date: August 2026