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## Change History

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## 1 - Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Skilltec Training's business is conducted in a socially responsible manner.

## 2 - Policy Statement

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. Skilltec Training takes a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counteract bribery.

Skilltec Training will uphold all laws relevant to counteracting bribery and corruption in all the jurisdictions in which we operate and we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

## 3 – Scope

### 3.1 - Who is covered by the policy?

In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for Skilltec, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **employees** in this policy).

This policy covers:

- ▶ Bribes
- ▶ Gifts and hospitality
- ▶ Facilitation payments
- ▶ Political contributions
- ▶ Charitable contributions



### 3.2 - Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

### 3.3 - Gifts and Hospitality

Employees must not offer or give any gift or hospitality:

that could be regarded as illegal or improper, or that violates the recipient's policies to any public employee or government officials or representatives, or politicians or political parties which exceeds £20 in value for each individual gift or £250 in value for each hospitality event (not to exceed a total value of £500 in any financial year), unless approved in writing by the employee's manager

Employees may not accept any gift or hospitality from our business partners if:

- ▶ it exceeds £20 in value for each individual gift or £250 in value for each hospitality event (not to exceed a total of £500 in any financial year), unless approved in writing by the employee's manager.
- ▶ it is in cash.
- ▶ there is any suggestion that a return favour will be expected or implied.

### 3.4 - Facilitation payments and kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid.

### 3.5 - Political contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

### 3.6 - Charitable contributions

Charitable support and donations are acceptable, whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the CEO.

All charitable contributions should be publicly disclosed.

## 4 - Your Responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager **OR** the Managing Director as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.



## 5 - Record-Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of any hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## 6 - How to Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager **OR** the Office Manager.

## 7 - Training and Communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy.

## 8 - Who Is Responsible for The Policy?

The Chief Executive Officer has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

## 9 - Monitoring and Review

The Management Team will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Executive Officer.

This policy does not form part of any employee's contract of employment and it may be amended at any time.