

Anti-bribery Policy

1 General

- 1.1 Assessment Services Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. This policy outlines Assessment Services Ltd's position on preventing and prohibiting bribery, in accordance with The Bribery Act 2010. Assessment Services Ltd will not tolerate any form of bribery by, or of, its staff, agents or sub-contractors or any person or body acting on its behalf.
- 1.2 This policy applies to all Assessment Services Ltd's sub-contractors, specialists or agents acting for, or on behalf of, Assessment Services Ltd within the UK and overseas. Every sub-contractor and associated person acting for, or on behalf of, Assessment Services Ltd is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Assessment Services Ltd.
- 1.3 All sub-contractors and associated persons are required to familiarise themselves and comply with this policy.

2 The Bribery Act 2010

- 2.1 For the purposes of The Bribery Act, bribery is defined as the giving or taking of a reward in return for acting dishonestly and/or in breach of the law.
- 2.2 Assessment Services Ltd is committed to complying with the Bribery Act 2010 in its business activities in the UK and overseas.
- 2.3 Under the Bribery Act there are four possible offences:
- bribing another person** (the offering, promising or giving of a reward to induce a person to perform a relevant function or activity improperly).
 - being bribed** (the accepting of, or agreeing to accept or requesting a reward in return for performing a relevant function or activity improperly).
 - bribing a foreign public official** (trying to influence a foreign public official with the intention of obtaining or retaining business in a situation where the public official was not permitted or required by law to be influenced).
 - failure to prevent bribery** (occurs when an organisation fails to stop people who are operating on its behalf from being involved in bribery).
- 2.4 A relevant function or activity includes public, state or business activities or any activity performed in the course of a sub-contractor's or associated person's work on behalf of Assessment Services Ltd, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

3 What is prohibited?

- 3.1 Assessment Services Ltd prohibits sub-contractors and associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or Assessment Services Ltd whether a public or government official, official of a state-controlled industry, political party or a private person or Assessment Services Ltd regardless of whether sub-contractors and associated persons are situated in the UK or overseas. The bribe might be made to ensure that a person or Assessment Services Ltd improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for Assessment Services Ltd in either obtaining or maintaining business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.
- 3.2 This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through sub-contractors or agents, customers, suppliers or other third parties.

4 Records

- 4.1 Where applicable sub-contractors and associated persons are required to take particular care to ensure that all Assessment Services Ltd records are accurately maintained in relation to any contracts or business activities with centres and public officials.
- 4.2 Due diligence should be undertaken by sub-contractors and associated persons prior to entering into any arrangement or relationship with a potential supplier of services, agent, consultant or representative.
- 4.3 Sub-contractors and agents are required to keep accurate, detailed and up-to-date records of any corporate hospitality, entertainment or gifts accepted or offered.

5 Working overseas

- 5.1 Sub-contractors and agents conducting business on behalf of Assessment Services Ltd outside the UK may be at greater risk of being exposed to bribery or unethical business conduct than UK-based sub-contractors. Sub-contractors and agents owe a duty to Assessment Services Ltd to be extra vigilant when conducting international business.
- 5.2 Sub-contractors and agents are required to co-operate with Assessment Services Ltd procedures and to report suspicions of bribery to the Assessment Services Ltd Executive Director. While any suspicious circumstances should be reported, sub-contractors and agents are required particularly to report:
- close family, personal or business ties that a prospective agent, representative or joint-venture partner may have with government or corporate officials, directors or employees;
 - a history of corruption in the country in which the business is being undertaken;
 - requests for cash payments;
 - requests for unusual payment arrangements, for example via a third party;
 - requests for reimbursements of unsubstantiated or unusual expenses; or
 - a lack of standard invoices and proper financial practices.

6 Facilitation payments

- 6.1 Assessment Services Ltd prohibits its sub-contractors and agents from making or accepting any facilitation payments. These are payments made to government officials for carrying out or speeding up routine procedures. Facilitation payments, or offers of such payments, will constitute a criminal offence by both the individual concerned and Assessment Services Ltd under the Bribery Act 2010, even where such payments are made or requested overseas. Sub-contractors and agents are required to act with greater vigilance when dealing with government procedures overseas.
- 6.2 Where a public official has requested a payment, sub-contractors and agents should ask for further details of the purpose and nature of the payment in writing. If the public official refuses to give these, this should be reported immediately to Assessment Services Ltd Executive Director.
- 6.2.1 If the public official provides written details, the Executive Director will consider the nature of the payment.
- 6.2.2 Where the Executive Director considers that the request is for a facilitation payment, the sub-contractor or agent will be instructed to refuse to make the payment and notify the public official that the sub-contractor or agent is required to report the matter to Assessment Services Ltd and the UK embassy.
- 6.3 Assessment Services Ltd seek the assistance of the relevant sub-contractor or agent in its investigation and may determine that the matter should be referred to the prosecution authorities.

7 Corporate Entertainment, Gifts and Hospitality

- 7.1 Assessment Services Ltd permits gifts and hospitality provided they are not offered, promised or accepted to secure an advantage for Assessment Services Ltd or any of its sub-contractors or agents or to influence the impartiality of the recipient.
- 7.2 Assessment Services Ltd procedures for managing its work with its sub-contractors and associated persons are aimed to protect them and Assessment Services Ltd from potential exposure to bribery.

8 Reporting Suspected Bribery

- 8.1 Assessment Services Ltd depends on its sub-contractors and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Sub-contractors and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery.
- 8.2 Sub-contractors and associated persons are encouraged to report in writing any concerns that they may have to a Manager as soon as possible. Any such

reports will be thoroughly and promptly investigated in the strictest confidence. Sub-contractors and associated persons will be required to assist in any investigation into possible or suspected bribery.

- 8.3 Sub-contractors and associated persons who report instances of bribery in good faith will be supported. Assessment Services Ltd will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report.
- 8.4 Excellence Squared Ltd will fully investigate any instances of alleged or suspected bribery. Sub-contractors and associated persons suspected of bribery may be suspended from their duties while the investigation is being carried out. Excellence Squared Ltd may terminate the contracts of any sub-contractors and associated persons who act for, or on behalf of, Assessment Services Ltd who are found to have breached this policy.
- 8.5 Assessment Services Ltd may also report any matter to the Regulator, Ofqual or any relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Assessment Services Ltd will provide all necessary assistance to the relevant authorities in any subsequent prosecution.