

## **Anti-Bribery Policy**

### **1. Policy Statement**

1.1 Assessment Services Ltd is committed to operating with the highest standards of integrity, transparency, and ethical conduct in all of its activities, both in the UK and internationally. We have a zero-tolerance approach to bribery and corruption in any form.

1.2 This policy outlines our approach to preventing bribery, in line with the Bribery Act 2010, and applies to all employees, contractors, sub-contractors, agents, specialists, and any individuals or organisations working on our behalf.

1.3 Non-compliance with this policy may result in disciplinary action, termination of contracts, and/or legal proceedings.

### **2. Understanding Bribery**

2.1 Under the **Bribery Act 2010**, bribery is defined as the offering, promising, giving, requesting, or accepting of any financial or other advantage to induce or reward improper performance of a function or activity.

2.2 The Act outlines four key offences:

- Offering a bribe
- Receiving a bribe
- Bribing a foreign public official
- Failure of an organisation to prevent bribery

2.3 Relevant activities include public, private, or charitable functions where individuals are expected to act in good faith, impartially, or in a position of trust.

### **3. What is Prohibited?**

3.1 Assessment Services Ltd strictly prohibits:

- Offering, giving, soliciting, or accepting bribes in any form, including cash, gifts, entertainment, hospitality, or other incentives.
- Attempting to improperly influence individuals or organisations to gain a commercial, contractual, regulatory, or personal advantage.
- Making or facilitating bribes indirectly, such as through agents, partners, suppliers, or third parties.

### **4. Corporate Gifts, Hospitality & Entertainment**

4.1 Reasonable, proportionate hospitality or promotional gifts are permitted only if:

- They are not intended to influence decision-making or secure an improper advantage.
- They comply with local laws and business practices.
- They are appropriately recorded and transparent.

4.2 Excessive, frequent, or lavish gifts or hospitality are strictly prohibited.

## **5. Facilitation Payments**

5.1 Facilitation payments (small unofficial payments to expedite routine processes) are illegal under UK law, regardless of local customs or practices. Assessment Services Ltd prohibits such payments under all circumstances.

5.2 If a public official requests a payment, this must be reported immediately to the Executive Director for review and action.

## **6. Working Overseas**

6.1 Those representing Assessment Services Ltd internationally must exercise extra caution and vigilance. Particular attention should be paid to:

- High-risk countries with a history of corruption
- Unusual payment requests or arrangements
- Close relationships between suppliers, officials, or potential partners

6.2 All concerns must be reported to the Director(s).

## **7. Record Keeping & Due Diligence**

7.1 To support transparency, all employees, sub-contractors, and agents must:

- Maintain accurate records of all transactions, expenses, gifts, and hospitality.
- Conduct appropriate due diligence when engaging suppliers, agents, or partners.
- Declare any conflicts of interest or close relationships that could create a risk of bribery.

## **8. Reporting Concerns**

8.1 All individuals working with or for Assessment Services Ltd have a duty to report concerns or suspicions of bribery. Reports can be made in confidence to a Manager or directly to the Director(s).

8.2 We operate a strict non-retaliation policy for individuals reporting concerns in good faith.

8.3 All reports will be thoroughly investigated, and disciplinary or legal action may follow where appropriate.

## **9. Consequences of Breach**

9.1 Anyone found to have breached this policy may face:

- Termination of employment or contract
- Civil or criminal proceedings
- Reporting to external bodies, such as Ofqual, regulatory authorities, or law enforcement

## **10. Review & Compliance**

10.1 This policy will be reviewed regularly to ensure it remains effective and compliant with legislation. All employees, contractors, and associated persons must familiarise themselves with this policy and comply fully.

### **Assessment Services Ltd – Anti-Bribery Policy**

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Next Review Due By: July 2026