



April 2024

Anti-Bribery & Anti-Corruption Policy

v1.1

Institute of Computer Education Ltd.

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Policy Statement

Our company is committed to conducting all business ethically, honestly, and transparently. We have zero tolerance for bribery or corruption and are dedicated to maintaining high standards of integrity across all activities, interactions, and relationships.

Purpose

The purpose of this policy is to clearly establish our position against bribery and corruption, ensuring all staff, contractors, partners, and learners understand their responsibilities in preventing, identifying, and reporting bribery or corrupt practices.

Scope

This policy applies to all employees, contractors, associates, management, directors, third-party suppliers, agents, representatives, and any individuals or entities acting on our behalf or involved with our courses, training, and assessments.

Definitions

Bribery refers to offering, promising, giving, receiving, or soliciting something of value to influence decisions or actions improperly. Bribery includes (but is not limited to):

- Financial payments, gifts, favours, or hospitality used improperly.
- Facilitation payments intended to expedite routine tasks improperly.
- Kickbacks or inducements provided to gain business advantages.

Corruption involves abuse of entrusted power or authority for personal gain or benefit. Examples include (but are not limited to):

- Conflict of interest influencing decisions or awarding contracts.
- Misappropriation or misuse of company assets or funds.
- Abuse of authority or position for personal or organisational advantage.

Responsibilities

All Employees and Associates must:

- Act ethically, honestly, and transparently in all dealings.
- Never engage in or tolerate bribery or corruption in any form.
- Report any concerns, suspicions, or known incidents immediately.

Management must:

- Promote a culture of integrity and transparency.
- Provide guidance and training to staff and contractors.
- Implement robust controls to detect, prevent, and address bribery or corruption risks.

Gifts & Hospitality

Employees, associates, or contractors must never offer or accept gifts, hospitality, or other advantages that could compromise objectivity or influence decision-making. All gifts or hospitality offered or received must be transparently declared, recorded, and reviewed by management.

Reporting Procedure

Suspicions or evidence of bribery or corruption must be immediately reported, confidentially and without fear of retaliation, to the designated Anti-Bribery & Anti-Corruption Officer or senior management team.

Investigation & Response

On receiving a report, the company will:

1. Conduct a preliminary review of allegations.
2. Undertake a full investigation where appropriate.
3. Maintain confidentiality, impartiality, and fairness.
4. Communicate findings clearly and promptly to involved parties.
5. Take appropriate corrective and preventive actions, including disciplinary measures, termination of relationships, or legal action as necessary.

Preventative Measures

To proactively prevent bribery and corruption, the company will:

- Provide clear guidance and training for staff and partners.
- Regularly review and update risk assessments and controls.
- Ensure transparent financial management and reporting.
- Conduct due diligence on third-party suppliers, partners, or contractors.

Sanctions

Confirmed breaches of this policy may lead to serious consequences, including:

- Disciplinary action or termination of employment/contracts.
- Reporting breaches to law enforcement or regulatory authorities.
- Legal proceedings and potential prosecution.

Monitoring & Review

This policy will be reviewed annually, or earlier if required due to emerging risks, regulatory changes, or identified issues. Regular audits will ensure compliance and effectiveness.