

# Anti-Bribery & Corruption Policy

## Introduction

The Bribery Act 2010 came into force in July 2011 and regulates how businesses conduct their activities in the UK and overseas.

Where an individual is found guilty of an offence under the Act they can receive a prison sentence of up to 10 years and a fine of up to £5,000. Companies can receive unlimited fines.

This Policy applies to all staff, clients and contractors.

## Statement of Intent

Axcis Education aims to ensure that the legislation, government guidance and associated best practice is adhered to at all times in the course of undertaking its business activities.

Axcis Education will fulfil its obligations through the adoption of this Policy, communicating it to staff, monitoring any incidents of non-compliance and ensuring that any potential breaches are investigated and the appropriate action is taken.

## Procedures

A bribe is defined as a financial advantage or other reward that is offered to, promised to, given to, or received by an individual or Company to induce or influence that individual or Company to perform its public or corporate functions or duties in an improper manner (i.e. not in good faith, not impartially, or not in accordance with a position of trust).

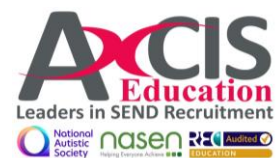
Under the Bribery Act 2010 it is a criminal offence for:

- a Company, employee or associated person (which includes consultants, agents, contractors or temporary staff) acting for, or on behalf of, the Company to offer, promise or give a bribe;
- a Company employee or associated person acting for, or on behalf of, the Company to request, receive or agree to receive a bribe whether or not they actually receive the bribe;
- a Company employee or associated person acting for, or on behalf of, the Company offering, to promise or give a bribe to a foreign public official with the intention of influencing that official in the performance of his/her duties to gain an advantage; and
- a Company failing to prevent bribery by its employees or associated persons acting for, or on behalf of the Company.

Axcis Education has put in place a procedure to ensure that it complies with the provisions of the Bribery Act 2010 and that its business activities are at all times conducted ethically and professionally (see Gifts Report Form below).

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## Actions

Axcis Education operates a zero-tolerance approach to any attempts at bribery by, or of, its staff. All staff are expected to report any suspected bribery activity to their line manager or HR Director, following Axcis Education's anti-bribery procedures.

All staff will receive the support of Axcis Education if they report in good faith any suspected bribery even if, following an investigation, it is found that no bribery took place.

In the event that Axcis Education believes an employee or associated person has been involved in any bribery activity it will invoke its Disciplinary Procedure. Axcis Education will carry out a full investigation and if the allegations are upheld, this may result in a finding of gross misconduct and immediate dismissal or Axcis Education may immediately terminate its contractual arrangements with any associated person.

Axcis Education will report issues to the regulatory authorities when appropriate. The Senior Management team will ensure that all staff are fully aware of, and comply with, Axcis Education's anti-bribery procedures.

## Communicating this Policy

This Policy is available on the Axcis Education website and is communicated to all contractors, clients and staff. This Policy will be reviewed annually, or sooner in the event of any legislative changes.

The contact details for Axcis Education are as follows:

Contact Point	Number or e-mail	Notes
Landline	0207 580 2956	Use during office hours
Martin Keddie	0207 580 2956	Associate Director – HR & Candidate Management
Sara Wills	0207 580 2956	HR & Training Director
E-mails	<a href="mailto:martin@axcis.co.uk">martin@axcis.co.uk</a> <a href="mailto:sara@axcis.co.uk">sara@axcis.co.uk</a>	E-mails are periodically checked out of hours

Signed: *Paul Gold*

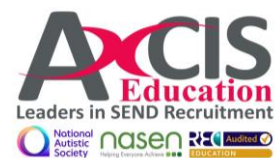
Position: CEO

Date: 7<sup>th</sup> December 2022

Revision date: Annually

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## Gifts Report Form

This form is to record any gifts that you may receive from clients, customers, suppliers and contractors, including prospective and former clients, customers, suppliers and contractors, or from any other person or organisation with which the Company has, or might have connections. A gift is deemed to be any payment or item given to you on an apparent ex gratia basis by any party in connection with your employment by the Company.

It must be completed as soon as you receive the gift and then passed to your manager for assessment.

You do not need to complete this form in relation to the receipt of small promotional gifts, i.e. items such as pens, mugs, calendars or stationery that bear the Company name or logo of another organisation, provided these have no significant financial value.

I declare that the information I have given on this form is correct. I understand that it is a disciplinary offence to provide false information on this form or to fail to report the receipt of gifts.

Full name of employee:
Date of receipt of the gift:
Please give full details of the nature of the gift:
Your estimated value of the gift:
Please give full details of the identity of the sender of the gift, including the nature of your business relationship with them:
Was the gift received for a special occasion, for example Christmas? YES / NO
If yes, please specify the occasion:

Signed: .....  
(Insert name of employee)

Signed: .....  
(Insert name of manager)

Date: .....

Date: .....

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