



Anti-Bribery Policy

09th June 2020

Introduction

Connect2Education Ltd is committed to the highest standards of ethical conduct and integrity in its business activities in the UK. This policy outlines the company's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. Connect2Education Ltd will not tolerate any form of bribery by, or of, its employees, consultants or any person or body acting on its behalf.

The Financial Director is committed to implementing effective measures to prevent, monitor and eliminate bribery.

Scope of this policy

This policy applies to all employees of Connect2Education Ltd, and to temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, Connect2Education Ltd ("associated persons") within the UK.

Every employee and associated person acting for, or on behalf of, Connect2Education Ltd is responsible for maintaining the highest standards of professional conduct.

Any breach of this policy is likely to constitute a serious disciplinary, contractual and /or criminal matter for the individual concerned and may cause serious damage to the reputation and standing of Connect2Education Ltd.

Connect2Education Ltd may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by Connect2Education Ltd.

The Bribery Act 2010 is in force from 1 July 2011.

This policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, Connect2Education Ltd; and
- the consequences of any breaches of this policy.

Bribery Act 2010

Connect2Education Ltd is committed to complying with the Bribery Act 2010 in its business activities in the UK.

Under the Bribery Act 2010, a bribe is a financial or other type of advantage that is offered or requested with the:

- intention of inducing or rewarding improper performance of a function or activity; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes public, state or business activities or any activity performed in the course of a person's employment, or on behalf of a school or academy as a client, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

an employee or associated person acting for, or on behalf of, Connect2Education Ltd offers, promises, gives, requests, receives or agrees to receive bribes; or an employee or associated person acting for, or on behalf of, Connect2Education Ltd offers, promises or gives a bribe to associated persons with the intention of influencing that person/s in the performance of his/her duties (where local law does not permit or require such influence); and Connect2Education Ltd does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

What is prohibited?

Connect2Education Ltd prohibits employees or 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 organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas. The bribe might be made to ensure that a person or Connect2Education 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 the organisation in either obtaining or maintaining tuition services, special needs consultancy tenders, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

Records

Employees and where applicable, associated persons, are required to take particular care to ensure that all student teaching records are accurately maintained.

In relation to recording and completion of, any contracts or business activities (including financial invoices and all payment transactions with clients, suppliers and public officials) the Financial Director will ensure that the highest standards of accuracy are employed.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Corporate entertainment, gifts, hospitality and promotional expenditure:

Connect2Education Ltd permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of Connect2Education Ltd; or
- to present Connect2Education Ltd.'s services effectively;

provided that it is:

- arranged in good faith, and
- not offered, promised or accepted to secure an advantage for Connect2Education Ltd or any of its employees or associated persons or to influence the impartiality of the recipient.

Connect2Education Ltd will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

Procedure

Employees and where relevant, associated persons should submit requests for proposed hospitality and promotional expenditure well in advance of proposed dates to the Financial Director for authorisation.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure;
- the identity of those who will be attending;
- the organisation that they represent; and
- details and rationale of the proposed activity.

The Financial Director of Connect2Education Ltd will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.

Connect2Education Ltd will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence or a particular business benefit was being sought (for example, prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from parents, clients, public officials, suppliers or other business contacts, considered by staff to be a bribe should be reported immediately to the Financial Director. In such circumstances, it is not appropriate to retain such gifts or be provided with the entertainment: employees and associated persons will be asked to return the gifts to the sender or refuse the entertainment, for example, where there could be a real or perceived conflict of interest.

As a general rule, gifts valuing less than £25 may be retained by employees, any gift above that value should be reported to the Financial Director.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior written approval from the Financial Director is required, together with details of the intended recipients, reasons for the gift and business objective. Employees and, where applicable, associated persons must supply records and receipts to the Financial Director.

Charitable and political donations

Connect2Education Ltd considers that charitable giving can form part of its wider commitment and responsibility to the community. The Financial Director of Connect2Education Ltd may choose to support a charity providing there is an agreement with the Head of Teaching and Learning which ensures that due diligence is adhered to.

Connect2Education Ltd may also support fundraising events involving employees.

Reporting suspected bribery

Connect2Education Ltd depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist Connect2Education Ltd and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to the Financial Director as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or associated persons may be being bribed; or
- concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.

Procedure

Employees should report any incidents of suspected bribery with the Financial Director in writing. Any such reports will be thoroughly and promptly investigated by the Financial Director in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees or associated persons who report instances of bribery in good faith will be supported by Connect2Education Ltd.

Connect2Education Ltd will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to the Financial Director or the Head of Teaching and Learning.

Action by Connect2Education Ltd

Connect2Education Ltd will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. Where any employee is suspected of bribery, proven allegations may result in a finding of gross misconduct and immediate dismissal. Connect2Education Ltd may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, Connect2Education Ltd who are found to have breached this policy.

Connect2Education Ltd may also report any matter to the relevant authorities, including the Financial Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. Connect2Education Ltd will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Review of procedures

The Financial Director will monitor and review the implementation of this policy and related procedures on an annual basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Connect2Education Ltd reserves the right to amend and update this policy as required.