



Anti-Bribery and Corruption Policy

What is its purpose:

The purpose of this policy is to confirm Squaricle Group's zero tolerance approach to all forms of bribery and corruption and our commitment to upholding all laws relating to the countering of bribery and corruption.

Why is it important to us?

Squaricle Group is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. The Company has zero-tolerance for bribery and corrupt activities.

Why is it important to our clients and learners?

This policy gives our clients and learners confidence that we are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever and with whomever we operate.

Who within the company does it apply to?

This policy applies to all Squaricle Group employees including any temporary or agency staff, sub-contractors and Associates.

Any employee breaching this policy, will face disciplinary action and could face dismissal for gross misconduct. The Company has the right to terminate a contractual relationship with an employee if they breach this policy.

When will it be effective from?

January 2020

What are our responsibilities and accountabilities?

- All employees must adhere strictly to the UK legislation in relation to bribery and corruption and follow the procedures designed by the Company to prevent bribery.
- Employees must not offer, promise or pay bribes and they must not request or receive bribes. The Company will also expect the highest standards of compliance in this area from other parties that provide services to the Company or on its behalf.
- All employees must ensure they read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information given.
- All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.
- If an employee has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must notify the Director of Operations: Brands, People & Quality.



Definition of Bribery

- Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
- Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from Director of Operations: Brands, People & Quality.

What is and what is NOT acceptable

- This section refers to:
 - Gifts and hospitality.
 - Facilitation payments.
 - Political contributions.
 - Charitable contributions.
- Squaricle Group accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:
 - It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
 - It is not made with the suggestion that a return favour is expected.
 - It is in compliance with local law.
 - It is given in the name of the Company, not in an individual's name.
 - It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
 - It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
 - It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
 - It is given/received openly, not secretly.
 - It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
 - It is not above a certain excessive value, as pre-determined by the Director of Operations: Brands, People & Quality (usually in excess of £100).
 - It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the Director of Operations: Brands, People & Quality
- Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may



- be accepted so long as it is declared to the Director of Operations: Brands, People & Quality, who will assess the circumstances.
- The Company recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
 - As good practice, gifts given and received should always be disclosed to the Director of Operations: Brands, People & Quality. Gifts from suppliers should always be disclosed.
 - The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Director of Operations: Brands, People & Quality should be sought.
 - The Company does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.
 - The Company does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.
 - The Company accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.
 - Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
 - The Company will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Squaricle Group Board of Directors.

What happens if an employee needs to raise a concern?

- If an employee suspects that there is an instance of bribery or corrupt activities occurring in relation to Squaricle Group, they are encouraged to raise concerns at as early a stage as possible. If they are uncertain about whether a certain action or behaviour can be considered bribery or corruption, they should speak to their line manager, the Director of Operations: Brands, People & Quality or another Squaricle Group Board Director.

Sources of further knowledge to support understanding and personal development

<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/bribery-corruption-and-sanctions-evasion>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832011/bribery-act-2010-guidance.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/667221/6_3323_Anti-Corruption_Strategy_WEB.pdf

