

08.Anti-Bribery and Corruption Policy

Introduction

Acting lawfully and ethically is vital to what we do as a company, and we will undertake all of our work with integrity.

As part of this commitment all forms of bribery and corruption are unacceptable and will not be tolerated.

We will ensure that any third party acting on our behalf does not act corruptly in our dealings with any other person.

This anti-bribery and corruption policy sets out how we intend to prevent acts of bribery and corruption. This policy has been designed to comply with legislation governing bribery and corruption as identified in The Bribery Act 2010.

This policy is designed to help identify when something is prohibited so that bribery and corruption is avoided, and to provide guidance if you are unsure about whether there is a problem, and you need further advice.

Who this policy applies to?

The fundamental standards of integrity under which we operate do not vary depending on where we work or who we are dealing with.

Integrity means doing the right thing even when nobody is watching.

This policy applies to all PM Training and Assessing Ltd staff (full and part time) and temporary workers (such as consultants or contractors) (together referred to as “employees” in this document) across the company no matter where they are located or what they do.

It is a collective responsibility that we comply with these standards.

This policy sets out a single benchmark that all employees must comply with, regardless of whether local law or practices might permit something to the contrary.

Part of our commitment to prevent bribery and corruption is to ensure that the people acting on our behalf also do so in compliance with effective anti-bribery and corruption policies.

Therefore, when we engage third parties, we have obligations to complete sufficient due diligence when entering arrangements to ensure that they are not acting corruptly, and to periodically monitor their performance to ensure ongoing compliance.

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal), and criminal liability for the individual involved (up to and including imprisonment).

What is bribery?

Bribery involves the following:

- when a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or
- when a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

It does not matter whether the bribe is:

- given or received directly or through a third party, for example an agent, distributor, supplier, joint venture partner or other intermediary); or for the benefit of the recipient or some other person.

Bribes can take many forms, for example:

- money (or cash equivalent such as shares);
- unreasonable gifts, entertainment or hospitality.
- kickbacks.
- unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents); unwarranted allowances or expenses;
- “facilitation” payments/payments made to perform their normal job more quickly and/or prioritise a particular customer; political/charitable contributions.
- uncompensated use of company services or facilities; or anything else of value.

This policy applies to both the public and private sectors.

Dealing with public officials poses a particular high risk in relation to bribery and corruption and specific guidance when dealing with public officials is set out below.

A breach of bribery laws can result in fines for both the company and the individual involved and, in some jurisdictions, could also result in imprisonment.

How do I know if something is a bribe?

In most circumstances, common sense will determine when a bribe is being offered.

However, here are some questions you should ask yourself if in doubt:

- am I being asked to pay something or provide any other benefit over and above the cost of the services being performed, for an example an excessive commission, a lavish gift, a kickback or make a contribution to a charity or political organisation?
- am I being asked to make a payment for services to someone other than the service provider?
- are the hospitality or gifts I am giving or receiving reasonable and justified? Would I be embarrassed to disclose them?
- when a payment or other benefit is being offered or received, do I know or suspect it is to induce or reward favourable treatment, to undermine an impartial decision-

making process or to persuade someone to do something that would not be in the proper performance of their job?

Policies and procedures

All forms of bribery and corruption are prohibited.

We will not tolerate any act of bribery or corruption. Any breach of this policy or local law could result in disciplinary action being taken and ultimately could result in dismissal.

A bribe does not actually have to take place - just promising to give a bribe or agreeing to receive one is prohibited.

Gifts, hospitality and expenses

Giving or receiving gifts or hospitality is often an important part of maintaining and developing business relationships.

However, all gifts and hospitality should be for a genuine purpose, reasonable, given in the ordinary course of business and should comply with this Policy and local law.

Lavish or unreasonable gifts or hospitality, whether these are given or received, are unacceptable as they can create the impression that we are trying to obtain or receive favourable business treatment by providing individuals with personal benefits.

In addition, gifts and hospitality can themselves be a bribe. Be careful to avoid even the appearance that the giving or accepting of gifts or hospitality might influence the decisions you take.

Facilitation payments

Facilitation payments are any payments, no matter how small, given to increase the speed at which they do their job. For example, this could include speeding up achievement.

All facilitation payments are generally prohibited. However, any request for a facilitation payment should be reported to the directors of PM Training and Assessing Ltd.

Agent, distributors, suppliers and joint venture partners

We could be liable for the acts of people that act on our behalf.

This includes agents, distributors, suppliers and joint venture partners (together referred to as "third parties"). As such we are committed to promoting compliance with effective anti-bribery and corruption policies by all third parties acting on our behalf.

All third parties should be made aware of the terms of this policy and of their obligations to comply with it. All arrangements with third parties should be subject to clear contractual terms including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

We will not engage any third party who you know or reasonably suspect of engaging in bribery. Appropriate due diligence should be undertaken before any third parties are

engaged. The appropriate level of due diligence will vary depending on the circumstances and you should use your judgement on a case by case basis.

All payments and commissions to third parties must:

- be made in accordance with the directors and their agreements.
- be made via bank transfer through the accounts payable system and be fully accounted for;
- must be in line with generally accepted rates and business practice for the service in question and should not be unjustifiably excessive or unsupported; and
- must be made in accordance with the terms of the contract with the person or company providing the services.

If you have any concerns that arrangements with a third party are not in accordance with this policy, you should ask the directors for help and guidance.

The prior approval of the directors is required in relation to:

- any payment in respect of fees, salary or commission (this does not include official fees);
- gifts and hospitality; and
- making charitable contributions in connection with dealings with a public official.

In addition, many public officials have their own rules regarding the acceptance of gifts and hospitality etc., and we must respect these rules where applicable. In accordance with this policy, political donations by or on behalf of the company are prohibited.

Compliance with the policy

It is the responsibility of the directors to ensure compliance with this policy at all times.

However, each of us has an obligation to act with integrity and to ensure that we understand and comply with the policy.

Whistleblowing

We are committed to ensuring that employees can speak up with confidence if they have any concerns or need to ask for help. If you suspect or observe anything that you think might be in contravention of this policy, you have an obligation to report it. We will not tolerate retaliation in any form against anyone for raising concerns or reporting what they genuinely believe to be improper or unethical.

Policy Review:

This policy has immediate effect and replaces all previous versions. This policy will be reviewed and amended, on or before July 2024



Pam Martin



Paul Martin

Date 30/04/2020 Version 1

Reviewed:



Pam Martin



Paul Martin

Date 13/08/2021 Version 2

Clive Phipps

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