



ANTI-BRIBERY, FRAUD & MALPRACTISE POLICY

Introduction

The Company is resolutely opposed to bribery and corruption in whatever form it may take. In general, the Company does not believe that it is appropriate for employees to accept gifts from customers, suppliers or any other person or organisation with which the Company has (or might have) business connections. It is important to ensure that no employee acts in any way that is inconsistent with the Company's objectives or with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business actions or decisions.

Purpose and scope

This policy forms part of the terms and conditions of all employees' contracts of employment and any breach of the policy will be regarded as misconduct, leading to disciplinary action up to and including summary dismissal.

Inducements

Any payments, gifts or inducements made by or on behalf of the business and which induce or are intended to induce someone to act improperly and payments, gifts or inducements to persuade customers or other officials such as planning officers (other than payments, fees etc which they are entitled to demand by written law) are matters which are likely to result in disciplinary action, including summary dismissal, against employees concerned.

Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice, are modest in value and cannot be interpreted as inducements to trade. Where there is any doubt, guidance should be sought from Human Resources.

Sales of the Companies services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of the Company, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form.

Receipt of gifts – disclosure

Employees should not accept gifts, money or entertainment from third party organisations or individuals where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial ones with a low value, should be returned.

Any employee who receives a gift of any kind from an existing or potential business contact must disclose the fact of the gift, its nature and the identity of the sender to his/her line manager. If the gift is anything other than a small token of appreciation having no substantial financial value, the employee will be required to return the gift to the sender with a polite note thanking him/her and explaining that it is the Company's policy that employees should not receive gifts.

If, in the opinion of the line manager, the gift might constitute a bribe or other inducement, the employee will be asked to pass the gift to a senior manager, who will return it to the sender with a suitable letter explaining the Company's policy and asking that it be respected in the future.

In cases where the employee's line manager agrees that the gift was sent to the employee as a token of gratitude for work carried out to a particularly high standard or for an exceptional level of service given, the employee may, at the line manager's discretion, be permitted to retain the gift. Thus small gifts that are genuinely given as a token of appreciation or gratitude will be acceptable, provided that the employee properly declares the gift in line with this policy and provided that the employee does not subsequently treat the person who sent the gift more favourably than other customers/suppliers, etc.

This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logo or company name of another organisation, provided that these have no significant value. However, since it is likely that such gifts will be received by only a limited number of employees, they should be shared amongst other members of staff where appropriate.

Internal suppliers

Any business transactions between Company subsidiaries for the supply of goods or services should be based on normal "arm's length" business principles. These principles should cover pricing and other contractual terms and must be as defensible as those to which independent parties might be expected to agree.

External suppliers

All suppliers are entitled to fair treatment and all potential suppliers should have a reasonable opportunity to win business. It is our policy to pay suppliers on time in accordance with agreed terms of trade. We set high standards for our suppliers in the context of our own ethical policy.

Competition

The Company will always compete vigorously, but in a fair and ethical way. Competitive success is built on providing good value and service excellence. Competitors should not be disparaged. When in contact with competitors, employees will avoid discussing confidential information and no attempt will be made to improperly acquire competitors "trade secrets" or any other confidential information. Employees must not publicise, discuss or share with competitors (even indirectly) pricing strategies or undertake any arrangements or practices which would conflict with the laws applicable to the business concerned.

Accounting standards and records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed.

All Company reporting must be accurate and complete and in compliance in all material respects with accounting policies and procedures. Employees must not materially mis-state or knowingly misrepresent management information for personal gain or for any other reason.

Signed: *Michelle McFall*
Aspects Total Training Ltd

To be reviewed: Annually