



Anti-bribery Policy

September 2023

Version 1.0
Approved by the Board of Governors

Scope

This policy sets out the responsibilities of the vantage College (“Vantage” also referred to as “We” or “Us” in this document) and those who work for us regarding our zero-tolerance position on bribery and corruption.

It also acts as a source of information and guidance for those working for Vantage. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy statement

Vantage is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Vantage has zero-tolerance for bribery and corruption. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships, wherever we operate.

Vantage ensures that it is compliant with all relevant anti-bribery and anti-corruption laws. We are bound by the laws of the UK, including the Bribery Act 2010, about our conduct both at home and abroad.

Bribery and corruption are punishable by up to ten years imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subject to an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation. We are committed to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Who is covered by the policy?

This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Board, and/or Committee members at any level.

In the context of this policy, third party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

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 as 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 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 the company's CEO or Legal Counsel.

What is and what is not acceptable

This section covers four areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality

VANTAGE 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:

- a. 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,
- b. It is not made with the suggestion that a return favour is expected,
- c. It is in compliance with local law,
- d. It is given in the name of the company, not in an individual's name,
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate),

- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you for the completion of a project,
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift,
- h. It is given/ received openly, not secretly,
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them,
- j. It is not above a certain excessive value, as pre-determined by Vantage,
- k. It is not an offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's CEO or Legal Counsel.

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 CEO or Legal Counsel, who will assess the circumstances.

Vantage 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 CEO or Legal Counsel. 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 CEO or Legal Counsel should be sought.

Facilitation Payments and Kickbacks

Vantage does not accept and will not make any form of facilitation payments of any nature. Facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

Vantage does not allow kickbacks to be made or accepted. Kickbacks are typically made in exchange for a business favour or advantage.

Vantage recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/ their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum,
- b. Ask for a receipt, detailing the amount and reason for the payment,
- c. Create a record concerning the payment,
- d. Report this incident to your line manager

Political Contributions

Vantage will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates.

Charitable Contributions

Vantage will disclose all charitable contributions it may make.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. 5.13 We 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 compliance manager.

Employee Responsibilities

As an employee of Vantage, you must ensure that you read, understand, and comply with the information contained within this policy and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control 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 anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the compliance manager.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Vantage has the right to terminate a contractual relationship with an employee if they breach this policy.

Raising a concern

This section covers three areas:

- How to raise a concern
- What to do if you are a victim of bribery or corruption
- Protection

How to raise a concern

If you suspect that there is bribery or corrupt activities happening in Vantage, you are encouraged to raise your concerns as soon as possible. If you're uncertain about whether a

certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the CEO or Legal Counsel.

Vantage will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

What to do if you are a victim of bribery or corruption

You must tell your line manager, the CEO or Legal Counsel as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future or if you have reason to believe that you are a victim of a corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Vantage understands that you may feel worried about potential repercussions. Vantage will support anyone who raises concerns in good faith under this policy, even if an investigation finds that they were mistaken.

Vantage will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, the CEO or Legal Counsel immediately.

Training

Vantage will provide relevant anti-bribery and corruption training to employees as appropriate.

Record keeping

Vantage will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

Vantage's CEO is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and VANTAGE may amend it at any time so as to improve its effectiveness at combatting bribery and corruption.

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