

Engage Education Services Anti-Bribery and Corruption Policy 2025

Introduction

Engage Education Services is committed to the highest possible standards of openness, probity and accountability. This Anti-Bribery policy applies to those who work for or on behalf of Engage Education Services and aims to ensure that we conduct all business in an honest way and without the use of corrupt practices or acts of bribery to obtain an advantage.

Engage Education Services's commitment to the highest legal and ethical standards is reflected in every aspect of how we operate. Our staff handbook for staff reinforces the requirement for us to ensure integrity in all our dealings.

This policy has been adopted by the Engage Education Services Board and will be communicated to all employees. Any breach of this policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action

What is Bribery?

A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage. Under the Bribery Act 2010, it is an offence either to offer a bribe or receive a bribe where it consists of an inducement or reward for the improper performance of a function or activity performed as part of employment, business or any function of a public nature. For example:

- If a school manager offered to find work for the niece of an Engage Education Services staff member in return for an agreement to waive recruitment fees due, the school management would be offering a bribe. If the staff member agreed, they would be guilty of accepting a bribe as agreeing to waive fees would be outside the authority of the Engage Education Services member of staff and therefore an improper performance of their function.
- If a member of staff took a school senior management team out for an expensive meal in the hope of influencing a tender process, this would be an act of bribery, since staff are all aware that schools are subject to strict requirements for tendering designed to ensure fairness and best value.

Bribery is not only a criminal offence, but it is also bad for business as it prevents free and fair competition. Engage Education Services has implemented safeguards against bribery, and employees who fail to adhere to all relevant policies and practices will be subject to disciplinary action, up to and including dismissal.

Safeguards

The company will take the following steps to prevent Bribery:

A. Risk Assessment

An annual Risk Assessment will examine the business activities to ensure there is an awareness of how we conduct ourselves concerning the 2010 Bribery Act

B. Accurate Books and Record-Keeping

Our books, records, and overall financial reporting will be transparent and accurately reflect each underlying transaction.

C. Effective Communications, Monitoring and Internal Control

Each Director will take steps to prevent bribery and corruption. HR will ensure that all staff are made aware of the standards of behaviour that are acceptable when doing business, and staff will be made aware of the

policies and procedures which exist to protect the business from allegations of improper conduct in its dealings.

Gifts, entertainment and hospitality include the giving or receipt of gifts, meals, and invitations to events or social functions which are proportionate and reasonable and are unlikely to engage the Act. Managers and staff should review the financial controls described in paragraph 8 of this document.

How to evaluate what is acceptable in relation to corporate gifts

First, take a step back and ask yourself the following:

- What is the intent? Is it building a relationship, or is it something else?
- How would this look if these details were published?
- What if the situation were reversed?
- Would there be a double standard?
- When in doubt, please consult the Finance Director.

Circumstances that are never permissible include examples that involve:

- A 'quid pro quo' (offered for something in return)
- Cash gifts or cash equivalent vouchers
- Entertainment of a sexual or similarly inappropriate nature

Circumstances that are usually acceptable include:

- Modest/occasional meals with someone with whom we do business
- Occasional attendance at ordinary sports, theatre or other events
- Gifts of a nominal value, e.g. pens or other promotional gifts

As a general rule, 'quid pro quo' is considered acceptable business practice provided everyone is acting within their authority to offer and accept them. For example, it will not be considered bribery if a school promises a minimum level of bookings in return for reduced fees, provided the school manager has the authority to offer the guarantee and the Engage Education Services manager has the authority to agree on the discount.

How to Raise a Concern

Should you become aware of someone acting in a manner which in any way contravenes this Anti-bribery policy, please immediately raise your concerns by speaking with your line manager or the HR department, who will ensure your anonymity when you raise a concern in good faith.

Conflicts of loyalty or interest

All employees are expected to declare in writing if they find themselves in a situation where their loyalty to the company comes into conflict with personal interests or loyalties. Such a declaration should be made to their immediate manager, who should then report it to the HR Manager. If appropriate, the Director responsible for the department should also be informed.

Responsibility

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group. Responsibility for compliance with this policy lies ultimately with management and the Board.

General Guidance on Financial Controls

- Budget holders (usually department managers/directors) control purchasing decisions and oversee the ordering process for their budget area.
- All planned purchases of over £5,000 must have Chief Executive or FD approval before proceeding.

Personal or business inducements

Staff are required to declare the acceptance of any significant (over £20 value) gifts, hospitality or other benefits (whether related to purchasing decisions or otherwise) to the HR Manager.

Anybody who suspects that they are being offered personal inducements in an attempt to encourage behaviour that may not be ethical or in the best interests of the company should report this immediately to the HR Manager.

This policy also applies if you are asked by any other party to offer/provide (personally or by the business) inducements to encourage behaviour that might not be ethical or in the best interests of our company or those of the other party's organisation. This applies whether they are staff, contractors, customers, suppliers or any other party that you come into contact with during work.

Gifts that are given out, such as confectionery, modest meals and invitations to events, should be pre-authorised by Line Managers, who are responsible for liaising with the budget holder (e.g. school giveaways = Marketing budget) about cost planning and the purchasing of common giveaways. Such gifts, meals and invitations are subject to the same policies in points 2 and 3, above.

Expense claims

The company Expense Procedure document (available on the Intranet) gives further details regarding what constitutes business expenses, who can authorise expenses and the financial limits of their authority.

The General Principles section of the Expense Procedure states that expenses must be "wholly, exclusively and necessarily incurred in the performance of their duties". The Meals and Entertaining section of the Expense Procedure gives some guidance on what is regarded as "entertaining" for business/customer entertaining and staff entertaining, and how these should be treated in expense claims.

Payment financial controls

Payments directly out of the business are only to be originated and authorised by designated personnel, in line with cheque-signing, credit card, cash and e-payment controls that are in place and overseen by the Finance Director. Payments by individuals on behalf of the business are subject to the Expense Procedure policy.

Key Contacts

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All up-to-date policies can be found via our website at <https://www.engageedservices.com/policies>