

ICTQual AB



Anti-Bribery and Corruption Policy

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1. Purpose

ICTQual AB is committed to conducting its business with integrity and in compliance with all applicable anti-bribery and anti-corruption laws. The purpose of this policy is to outline ICTQual AB's zero-tolerance approach to bribery and corruption and to provide guidance on how to recognize, prevent and report such activities.

2. Scope

This policy applies to:

- ICTQual AB employees, directors, contractors and consultants.
- Approved Training Centres (ATCs) and their employees, agents and representatives.
- Third parties acting on behalf of ICTQual AB, including business partners, suppliers and intermediaries.

3. Policy Statement

ICTQual AB is committed to maintaining the highest standards of integrity in its dealings. Bribery and corruption are illegal and unethical and ICTQual AB will not tolerate such behavior from any of its employees, agents, or partners. The company will actively prevent, detect and address any instances of bribery or corruption in the workplace and business activities.

4. Legal Framework

This policy complies with the following UK legislation:

- **The Bribery Act 2010**
- Prohibits bribing another person and receiving bribes.
- Establishes corporate liability for failing to prevent bribery.
- **The Proceeds of Crime Act 2002 (POCA)**
- **The Fraud Act 2006**

5. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence a business decision or behavior, typically in exchange for unfair advantage or personal gain.
- **Corruption:** Dishonest or unethical conduct by a person in a position of power, typically involving bribery, fraud, or conflict of interest.
- **Facilitation Payments:** Small bribes given to expedite routine governmental actions (e.g., processing permits or licenses). These are prohibited under this policy.
- **Kickbacks:** Payments made in return for services or goods, intended to secure business or rewards.

6. Bribery and Corruption Risks

ICTQual AB recognizes that bribery and corruption risks may arise in a variety of business situations, including but not limited to:

- Offering or receiving gifts, hospitality, or payments to influence a decision or gain an advantage.
- Engaging third parties (agents, suppliers, contractors) who may use improper means to secure business.
- Employees and third parties involved in government-related activities (e.g., permits, licenses).
- Political contributions or charitable donations made for improper purposes.

7. Prohibited Activities

ICTQual AB strictly prohibits the following:

- Offering, paying, or receiving bribes, kickbacks, or facilitation payments.
- Providing gifts or hospitality in exchange for favorable treatment or to influence decision-making.
- Making political donations or charitable contributions that could be perceived as an attempt to gain an unfair advantage.
- Any actions that could lead to the improper influence of business decisions, whether directly or indirectly.

8. Responsibilities and Obligations

8.1 ICTQual AB Management

- Ensure that the anti-bribery and corruption policies are implemented and adhered to throughout the organization.
- Provide resources and training to ensure employees understand their obligations under this policy.
- Monitor compliance and investigate any reported instances of bribery or corruption.

8.2 Employees and Representatives

- Adhere to the principles outlined in this policy and avoid any behavior that could be perceived as bribery or corruption.
- Report any concerns or instances of bribery or corruption to the designated compliance officer.
- Decline any gifts, hospitality, or incentives that could be construed as influencing business decisions.

8.3 Third Parties (ATCs, Agents, Suppliers, etc.)

- Ensure that their employees, agents and representatives also comply with the provisions of this policy.
- Conduct due diligence on business partners to identify potential bribery and corruption risks.

9. Reporting and Whistleblowing

ICTQual AB encourages individuals to report any suspicions or concerns regarding bribery or corruption. Concerns should be reported through the following channels:

- Direct supervisor or manager.
- Designated Compliance Officer or the HR department.
- Whistleblowing Hotline/Email (for anonymous reporting).
- All reports will be treated confidentially and investigated thoroughly. Retaliation against those who report concerns in good faith will not be tolerated.

10. Training and Awareness

- ICTQual AB will provide regular training on anti-bribery and anti-corruption practices to employees, directors and relevant third parties (e.g., ATCs, contractors).
- Training will include understanding bribery and corruption risks, recognizing prohibited activities and knowing how to report concerns.
- New employees and third parties will receive training upon joining ICTQual AB or entering a contract with the company.

11. Monitoring and Enforcement

ICTQual AB will:

- Conduct regular audits and risk assessments to ensure compliance with this policy.
- Monitor business activities to identify potential risks of bribery or corruption.
- Take disciplinary action against any employee, contractor, or third party found to have engaged in bribery or corruption.

12. Sanctions for Non-Compliance

Any employee, contractor, or third party found to have violated this policy will face disciplinary action, which may include:

- Termination of employment or contract.
- Legal action, including criminal prosecution.
- Fines and sanctions as imposed by the relevant authorities.

13. Review and Updates

This policy will be reviewed annually to ensure it remains effective and in line with any changes in the legal or regulatory environment. Any amendments to this policy will be communicated to all employees, contractors and relevant third parties.

Contact Us

For further information or assistance with conflicts of interest, please contact ICTQual AB:

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