



Kingsley Anti-Bribery Policy

Policy Statement

Kingsley values its reputation for ethical behaviour and financial probity. Kingsley is committed to carrying out its activities fairly, honestly, openly and to ensuring it adheres to and promotes best practice in bribery prevention. Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement to encourage a person to perform a relevant function or activity improperly or to reward that person for already having done so. Bribery is a criminal offence, morally wrong and exposes members of Kingsley's community to the risk of prosecution, fines and/or imprisonment (up to a maximum of 10 years) as well as endangering its reputation.

Kingsley recognises that market practice varies across the countries in which Kingsley carries out its business, however, remains committed to its responsibilities under the Bribery Act 2010 and ensuring that no bribes are made, offered, sought or obtained by anyone acting on its behalf, to anyone, anywhere in the world by:

- setting out and maintaining a clear Anti-Bribery Policy and other relevant policies and procedures, for example, Public Interest Disclosure (Whistleblowing) Policy, which are proportionate to the risks faced by Kingsley and enable concerns to be brought to its attention (in confidence, if required) and dealt with.
- informing all staff so they can recognise and avoid the use of bribery by themselves or others.
- encouraging all its staff, students and individuals (including agents, consultants, contractors, service providers and external partner organisations) working on behalf of, under contract from or in collaboration with any part of Kingsley to report any suspicious activity or wrongdoing which could be construed as bribery.
- robustly and promptly investigating all cases of actual or suspected bribery and ensuring appropriate action is taken against any individual(s) involved in bribery. The Police will be informed where considered appropriate.

This Policy:

- applies to all staff and students and individuals (including agents, consultants, contractors, service providers and external partner organisations) working on behalf of, under contract from or in collaboration with any part of the Kingsley.

- extends to all of the Kingsley's activities and operations and to all of its dealings and negotiations with third parties in all countries in which its staff, students, subsidiaries, agents, partners and associates operate.
- strictly prohibits the offering, enticing or acceptance of any bribe (in any form including a facility payment) to or from any person, company, wherever they are situated and whether they are a public official or body or private person or company by any member of staff or student or individual working on behalf of, under contract from or in collaboration with any part of the Kingsley in order to gain any commercial, contractual or regulatory advantage for the Kingsley or in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.
- requires all staff or students or individuals working on behalf of, under contract from or in collaboration with any part of Kingsley to be responsible for:
 - (i) conducting themselves at all times with integrity, impartiality and honesty, safeguarding any resources and/or assets belonging to Kingsley for which they are responsible and complying with all applicable law of the countries in which they are working; and
 - (ii) helping detect, prevent and report not only bribery but all suspicious activity or wrongdoing which could be construed as bribery; and
 - (iii) being alert to the possibility of unusual events, behaviours or transactions which could be an indication of bribery; and
 - (iv) reporting all concerns or suspicions of bribery, fraud or corruption to their line manager or another senior person so that action can be taken under the Kingsley's Fraud Response Plan; and
 - (v) co-operating fully with whomsoever is conducting internal checks, reviews and/or investigations.

Knowingly failing to comply with this Policy by:

- any member of staff or student will be considered a serious matter of misconduct and action will be taken under local disciplinary procedures up to and including dismissal.
- any individual (including any agent, consultant, contractor, service provider and external partner organisation) working on behalf of, under contract from or in collaboration with any part of the Kingsley will likely result in the termination of its business and contractual relationship with the Kingsley.

3. Bona fide hospitality and promotional, or other business expenditure which seeks to improve the image of an organisation, to better present products and services, or to establish cordial relations, is recognised as an established and important part of doing business and it is not the intention of the Bribery Act 2010 to criminalise such behaviour.

This Policy therefore is not meant to prohibit the following practices providing they are customary in a particular market, are reasonable and proportionate and are properly recorded:

- normal and appropriate hospitality as permitted under the Kingsley's Financial Regulations.
 - the giving of ceremonial gifts at a special time.
 - the use of recognised fast track process which is available to all on payment of a fee.
- Equality Impact Assessment

Kingsley is committed to the promotion of equality, diversity and a supportive environment for all members of our community. Our commitment to equality and diversity means that this policy has been screened in relation to the use of plain English, the promotion of the positive duty in relation to race, gender and disability and avoidance of discrimination to other equality groups related to age, sexual orientation, religion or belief or gender reassignment.

All Kingsley policies are subject to periodic review under the equality impact assessment process. Other Related Policies and Procedures Financial Regulations Fraud Response Plan Public Interest Disclosure Policy Review/Dissemination of and Access to the Policy

The CEO is responsible for issuing relevant procedures for the prevention, detection, reporting and handling of bribery and for making all relevant persons aware of the necessity of complying with this Policy.

Kingsley's Senior Management has a responsibility for monitoring the operation and effectiveness of anti-bribery arrangements and should receive appropriate reports on bribery activity. Kingsley has a responsibility to oversee the Kingsley's policy on fraud and irregularity, including being notified of any action taken under that policy. All Kingsley policies, once approved, will be held electronically in a document repository on the Kingsley intranet.

In addition, this Policy:

- will be published on Kingsley's website to be available via the following link to all staff, students and individuals (including any agents, consultants, contractors, service providers and external partner organisations) working on behalf of, under contract from or in collaboration with any part of the Kingsley:
- will be embedded within Kingsley's Financial Regulations which are published on the Kingsley's website and available via the following link to all staff, students and individuals (including any agents, consultants, contractors, service providers and external partner organisations) working on behalf of, under contract from or in collaboration with any part of Kingsley:

Further details and guidance on the Bribery Act 2010 is available on:
<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>

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