



## **Anti Bribery Policy**

**Effective Date: 21/03/2024**

**Renewal:20/03/2025**

### **Anti-Bribery Policy**

#### **1. Introduction**

MCFM Global Academy is committed to conducting business with integrity, transparency, and adherence to the highest ethical standards. Bribery and corruption undermine trust, fairness, and accountability in our operations and relationships. Therefore, this Anti-Bribery Policy outlines our commitment to preventing bribery in all its forms and provides guidance to employees, contractors, and stakeholders on how to identify, report, and mitigate bribery risks.

#### **2. Policy Statement**

MCFM Global Academy prohibits any form of bribery, whether direct or indirect, in all aspects of our business operations, including interactions with employees, customers, suppliers, government officials, and other stakeholders. We will not offer, promise, give, request, or accept bribes, kickbacks, or any other improper inducements or favours to gain business advantages or influence decision-making processes.

#### **3. Scope**

This policy applies to all employees, officers, directors, contractors, agents, consultants, and representatives of MCFM Global Academy, regardless of their position or level of authority. It also extends to interactions with third parties, including customers, suppliers, business partners, and government officials, both domestically and internationally.



#### **4. Prohibited Conduct**

- a) Offering, promising, giving, or accepting bribes, kickbacks, or other improper payments or benefits to or from any individual or entity, whether directly or indirectly.
- b) Engaging in facilitation payments or small bribes to expedite routine government services or administrative processes.
- c) Using intermediaries, agents, or third-party representatives to facilitate bribery or influence-peddling activities on behalf of the company.
- d) Concealing or disguising the true nature, purpose, or recipient of any payment or benefit to avoid detection or accountability.
- e) Creating, maintaining, or participating in off-the-books accounts, slush funds, or other mechanisms designed to facilitate bribery or corruption.

#### **5. Compliance Obligations**

- a) All employees and stakeholders must comply with applicable anti-bribery laws and regulations, including the UK Bribery Act 2010, the U.S. Foreign Corrupt Practices Act (FCPA), and other relevant legislation in jurisdictions where we operate.
- b) Employees must familiarise themselves with this policy and seek guidance from the Compliance Officer or Legal Department if they have any questions or concerns about compliance with anti-bribery laws and regulations.
- c) Employees are prohibited from engaging in any activities that may create or contribute to a risk of bribery or corruption, including conflicts of interest, gifts and hospitality, and political contributions.

#### **6. Reporting and Whistleblowing**

MCFM Global Academy encourages employees and stakeholders to report any suspected or actual instances of bribery or corruption promptly and confidentially through established reporting channels. Employees can report concerns or violations of this policy to their supervisor, the Compliance Officer, Human Resources, or the anonymous whistleblower hotline.



## **7. Consequences of Non-Compliance**

Violations of this Anti-Bribery Policy may result in disciplinary action, up to and including termination of employment, legal action, fines, and reputational damage to the company. MCFM Global Academy will cooperate fully with law enforcement authorities and regulatory agencies in investigating and prosecuting acts of bribery and corruption.

## **8. Training and Awareness**

MCFM Global Academy provides regular training and awareness programs to educate employees and stakeholders about the risks and consequences of bribery and corruption. Training includes information on identifying red flags, reporting procedures, and ethical decision-making in business dealings.

## **9. Review and Revision**

This Anti-Bribery Policy is subject to periodic review and revision to ensure alignment with changes in laws, regulations, and best practices in anti-bribery compliance. Updates to the policy will be communicated to employees and stakeholders as necessary.

## **Conclusion**

MCFM Global Academy is committed to fostering a culture of integrity, accountability, and ethical conduct in all our business activities. By adhering to the principles and requirements outlined in this Anti-Bribery Policy, we uphold our commitment to conducting business with honesty, fairness, and respect for the law.

Maxcene Crowe

CEO, MCFM Global Academy