



Anti-Bribery Policy

Introduction:

International Centre for Cultural Excellence (ICCE) is committed to conducting its business fairly, ethically, and with integrity. As part of this commitment, ICCE has implemented this Anti-Bribery Policy to comply with the UK's Bribery Act 2010 and ensure that bribery is not tolerated in any form within the organization.

Policy Statement:

ICCE prohibits all forms of bribery, both direct and indirect, and expects all employees, contractors, agents, and anyone else acting on behalf of the organization to adhere to this policy. Bribery is a criminal offense and undermines the principles of fairness, honesty, and transparency that ICCE upholds.

Scope:

This policy applies to all employees, contractors, agents, consultants, volunteers, and anyone else representing ICCE, regardless of their position or role. It covers all activities undertaken by ICCE, both within the UK and internationally.

Definition of Bribery:

Bribery is defined as the offering, giving, receiving, or soliciting of any financial or other advantage with the intention to influence a person's actions, decisions, or conduct, in order to gain an improper advantage or induce improper performance of a function or activity.

Examples of bribery may include, but are not limited to, the following:

- Offering or accepting cash or financial incentives to influence a business decision.
- Providing or accepting gifts, hospitality, or entertainment as inducement to secure a favorable outcome.
- Promising or offering a job, contract, or promotion in exchange for preferential treatment.
- Making facilitation payments to expedite routine processes or services.

Responsibilities:

a) Board of Directors and Management

The Board of Directors and senior management are responsible for setting the tone at the top and ensuring that the organization's anti-bribery measures are effective. They must communicate this policy to all employees and stakeholders, provide appropriate training, and regularly review the policy's implementation and effectiveness.



b) Employees and Representatives

All employees and representatives of ICCE are responsible for familiarizing themselves with this policy and complying with its provisions. They must avoid any activity that may lead to or be perceived as bribery and promptly report any suspected or actual bribery to the designated person.

Facilitation Payments:

ICCE strictly prohibits facilitation payments, which are small payments made to expedite routine services or processes to which an individual or entity is legally entitled. Such payments are illegal and contradict ICCE's commitment to integrity and fairness.

Gifts, Hospitality, and Entertainment:

Giving and receiving of gifts, hospitality, or entertainment must be in compliance with ICCE's Gifts and Hospitality Policy. Any offering or acceptance of such must be transparent, reasonable, and not influence or be perceived to influence business decisions.

Third-Party Due Diligence:

ICCE will conduct due diligence on third parties, such as contractors, suppliers, agents, and consultants, to ensure they adhere to anti-bribery laws and align with ICCE's values.

Reporting and Whistleblowing:

ICCE encourages employees and stakeholders to report any suspected or actual incidents of bribery promptly. A confidential whistleblowing mechanism is available for reporting such concerns.

Consequences of Breach:

Breaches of this policy will be taken seriously and may result in disciplinary action, including termination of employment or contract. Legal action may be pursued if appropriate.

Review:

This policy will be reviewed periodically to ensure its continued relevance and effectiveness in preventing bribery. This Anti-Bribery Policy is intended to uphold ICCE's commitment to ethical and responsible business practices and foster an environment of trust and integrity among all stakeholders.