

LEARNING SPOT LTD

Trading as The Builders Academy™

Anti-Bribery and Corruption Policy

(In accordance with the UK Bribery Act 2010)

Policy Statement

The company is committed to conducting all business activities honestly, fairly, ethically, and in full compliance with the UK Bribery Act 2010. We operate a zero-tolerance approach towards bribery and corruption in any form and are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

Bribery and corruption are criminal offences and can expose both the company and individuals to serious legal penalties, reputational damage, and loss of business. All employees, contractors, consultants, suppliers, and any person acting on behalf of the company are expected to comply with this policy at all times.

Scope

This policy applies to all employees, directors, agency workers, contractors, consultants, suppliers, and third parties associated with the company, regardless of their position or location.

Definition of Bribery and Corruption

Bribery involves offering, promising, giving, requesting, or accepting an advantage or financial incentive with the intention of influencing behaviour or securing an improper business advantage.

Corruption generally refers to dishonest or fraudulent conduct by a person in a position of power or trust, often involving bribery for personal gain.

Examples of prohibited conduct include:

- Offering money, gifts, hospitality, or favours to secure business advantages
- Accepting payments or incentives in return for favourable treatment
- Making unofficial payments to speed up routine procedures
- Providing excessive gifts or entertainment intended to influence decisions
- Using third parties or intermediaries to make improper payments on the company's behalf

Because apparently some people looked at “fair business practice” and thought, “What if we added envelopes full of cash?” A stunning contribution to civilisation.

Gifts and Hospitality

Reasonable and proportionate hospitality or gifts may be acceptable where they are lawful, appropriate, transparent, and intended to maintain good business relationships rather than influence decisions improperly.

Employees must not:

- Offer or accept cash gifts
- Offer or receive gifts or hospitality that could be perceived as influencing business decisions
- Accept lavish or excessive entertainment or benefits

Any gifts or hospitality offered or received should be declared in accordance with company procedures.

Facilitation Payments

The company strictly prohibits facilitation payments or “kickbacks” of any kind. These are unofficial payments made to secure or speed up routine government or business actions.

Employees who are asked to make such payments should refuse wherever possible and report the matter immediately to management.

Employee Responsibilities

All employees and associated persons must:

- Act honestly and with integrity in all business dealings
- Comply with this policy and relevant anti-bribery laws
- Avoid situations that could lead to conflicts of interest
- Report any suspected bribery or corruption immediately
- Cooperate fully with any investigation relating to suspected misconduct

Managers are responsible for ensuring employees understand and comply with this policy.

Reporting Concerns

Employees are encouraged to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage. Reports will be treated seriously and, where possible, confidentially.

No employee will suffer retaliation or detrimental treatment for reporting genuine concerns in good faith.

Breach of Policy

Any employee found to have breached this policy may face disciplinary action up to and including dismissal. Where criminal conduct is suspected, the matter may also be referred to law enforcement authorities.

Third parties acting on behalf of the company who breach this policy may have their contracts terminated immediately.

Review

This policy will be reviewed regularly to ensure ongoing compliance with the UK Bribery Act 2010 and to maintain effective anti-bribery controls throughout the organisation.

Created By: T Ismail April 2025

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