

CIC anti-bribery and corruption policy



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1. definitions

In this policy “we”, “us”, and “the School” mean Colegio Internacional de Caracas (CIC),

“*Bribe*” means an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage; “to Bribe” and “Bribery” are construed accordingly.

“*Relevant Person*” means any individual (whether an officer or employee of the School, or a temporary worker, contractor or consultant providing services to or on behalf of the School) or any corporate entity who performs functions for or on behalf of the School.

2. introduction

One of CIC’s core values is to uphold responsible practice. It is committed to promoting and maintaining the highest level of ethical standards in relation to all our school activities. Its reputation for maintaining lawful business practices paramount importance and this Policy is designed to preserve these values. CIC therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems to counter bribery.

3. purpose and scope of this policy

This Policy sets out the steps all of us must take to prevent bribery and corruption in our school and to comply with relevant legislation. It is aimed at:

- ensuring compliance with anti-bribery laws, rules and regulations, not just within Venezuela but in any other country within which CIC has relations with
- enabling any Relevant Person to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognize, prevent and report any wrongdoing, whether by themselves or others;
- providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with;
- creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery or corruption.

All Relevant Persons are expected to adhere to the principles set out in this Policy.

4. risks of not acting with integrity

Involvement in Bribery or corruption carries many risks. Among them are:

- a company or school which pays or accepts Bribes is not in control of its business and is at risk of blackmail;
- if the school is found guilty of Bribery or even of failing to have adequate procedures in place to prevent Bribery, it will be subject to unlimited fines;
- any person found guilty of Bribery will be subject to fines and/or imprisonment of up to 10 years;
- a public exposure, or even allegation, of bribery would entail severe reputational damage. The School's banking or supply facilities might be withdrawn or be available on much less favorable terms, and the school could be blacklisted as an approved tenderer for both public and private sector contracts;
- the cost of our insurance cover could increase very significantly; and
- good people will not want to work for us.

5. benefits of acting with integrity

Equally, there are very clear benefits to acting with propriety. These include:

- we increase our chances of being selected as a supplier in both the public and private sectors;
- we remain in good standing with our banks and our own suppliers and they will want to keep doing business with us;
- a business with high ethical standards is a good place to work

6. policy statement

All Relevant Persons and Associated Persons are required at all times:

- to act honestly, responsibly and with integrity;
- to safeguard and uphold the School's core values by operating in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a Bribe. All Relevant Persons and all Associated persons are expected to adhere strictly at all times to the guidelines set out in this Policy.

7. gifts and Hospitality

The School occasionally provides or receives gifts and hospitality from parents, students, sponsors, or other stakeholders. This is not prohibited by the Bribery Act provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage;
- it complies with local laws;
- it is given in the Company's name, not in the giver's personal name;
- it does not include cash or a cash equivalent (such as gift vouchers);
- it is of an appropriate and reasonable type and value and given at an appropriate time;
- it is given openly, not secretly;
- it is approved in advance by the Superintendent of the School

In summary, it is not acceptable to give, receive, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain a business advantage for them.

8. facilitation payments

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited.

9. what are the indicators of bribery?

Common indicators of corruption include those listed below. There may well be others. For example:

- payments are for abnormal amounts (e.g. commission), or made in an unusual way, eg what would normally be a single payments is made in stages, through a bank account never previously used, or in a currency or via a country which has no connection with the transaction;

- process is bypassed for approval or sign-off of terms or submission of tender documents, payments, or other commercial matters; those whose job it is to monitor commercial;
- individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected;
- decisions are taken for which there is no clear rationale;
- records are incomplete or missing.

10. political contributions

You should be aware that such contributions can be (or be seen as) Bribes in disguise. The school does not make donations to political parties. No individual is to make a donation stated to be, or which could be taken to be, on our behalf without the prior approval of the Board. You may, of course, make political donations in a personal capacity but please be sensitive to how such contributions could be perceived, especially by those who are aware of your connection with the Company.

11. charitable donations

Bribes may even be disguised as charitable donations. [Again, for that reason, donations we make are approved by resolution of the Board and recorded.] Whilst individuals may of course make personal donations to charity, they should not do so on behalf of the School without prior approval from the Board.

12. local circumstances

We understand that different parts of the world have different social and cultural customs. This does not affect our position that we do not pay or accept bribes or act corruptly: we do not and will not. However, subject to that position, we understand the need to be sensitive to local customs.

13. responsibility to report and the reporting procedure

All Relevant Persons are contractually required to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected Bribery or corruption. All Relevant Persons have a duty to prevent, detect and report any incident of Bribery and any potential risks of Bribery. If you know or suspect that any Relevant Person plans to offer, promise or give a Bribe or to request, agree to receive or accept a Bribe in connection with the School's operation, you must disclose this to the School Superintendent, as quickly as possible to allow appropriate action to be taken promptly.

CIC is committed to taking appropriate action against Bribery and corruption. This may include either reporting the matter to an appropriate external government department, regulatory agency or the police and/or taking internal disciplinary action against relevant employees and/or terminating contracts with associated persons.

The School will keep your disclosure confidential during any investigation it undertakes to the extent that this is practical and appropriate in the circumstances. The School will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The School is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offense has taken place or may take place in the future or because they may assist in the investigation of an allegation of Bribery or corruption.

14. record keeping

All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off the record" to facilitate or conceal improper payments.

15. monitoring compliance

The School Superintendent has primary responsibility for ensuring compliance with this Policy and will review its contents on a regular basis. He will be responsible for monitoring its effectiveness and will provide regular reports in this regard to the directors of the Company who have overall responsibility for ensuring this Policy complies with the School's legal and ethical obligations.

16. sanctions for breach of this policy

A breach of any of the provisions of this Policy by any Relevant Person who is an administrator or employee of the School will constitute **a disciplinary offence** and will be dealt with in accordance with the School's disciplinary procedure. Depending on the gravity of the offence, it **may be treated as gross misconduct and could render the officer or employee liable to summary dismissal.**

Breach of this policy by any Relevant Person who is a temporary worker, contractor or consultant providing his/ her services to the School may lead to the immediate termination of that temporary worker's, contractor's or consultant's engagement by the Company.

Breach of this policy by any Relevant Person which is a corporate entity could lead to the suspension or termination of any relevant contract, sub-contract or other agreement between the corporate entity and the School.