



## Anti-Bribery Policy

### 1. Policy Statement

Immerse Medical Training LTD (“The Company”) values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation.

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings wherever we operate and to implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the United Kingdom, including the Bribery Act 2010. Bribery and corruption are punishable for individuals by imprisonment and if the company is found to have taken part in corruption we could face fines and damage to our reputation. We therefore take our legal responsibilities very seriously.

The Company prohibits:

- the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement.

To or from:

- any person or company, wherever they are situated and whether they are a public official, public body, private person or private company.

By:

- any individual employee, agent or other person or body acting on the Company’s behalf.

In order to:

- gain any commercial, contractual or regulatory advantage for the Company in a way which is unethical.



- gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

## Anti-Bribery Policy

### 2. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

The company's aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

The company recognises that market practice varies across the territories in which it does business and what is normal and acceptable in one place may not be in another. This policy prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of the Company or of the person or body employing them or whom they represent.

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

- Normal and appropriate hospitality



- The giving of a ceremonial gift on a festival or at another special time
- The use of any recognised fast-track process which is available to all on payment of a fee
- The offer of resources to assist the person or body to make the decision more efficiently provided that they are supplied for that purpose only.

## Anti-Bribery Policy

### 3. Scope

#### 3.1 This policy applies to:

- All employees working in any role, (whether permanent, fixed-term or temporary);
- Any individual working for but not employed directly by Immerse Medical Training Limited such as consultants, contractors, trainees, seconded staff, homeworkers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, wherever located (collectively referred to as employees in this policy);
- Any person who takes up the services of the company;

#### 3.2 Definition

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, e.g.

#### Offering a bribe

You offer a potential business partner tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for the company. It may also be an offence for the potential client to accept your offer.

#### Receiving a bribe



An employer offers your daughter a job with their company if you pass all the current learners completing their apprenticeship that are employed by that company.

## Anti-Bribery Policy

### 4. Roles and Responsibilities

#### 4.1 Directors

The directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

#### 4.2 Head of Centre

The Head of Centre has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

#### 4.3 Management

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

#### 4.4 Development Manager

Review the policy on an annual basis.

#### 4.5 Employee

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the company. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via the whistle-blower's procedure.



## Anti-Bribery Policy

### 5. Policy Implementation - Procedures

5.1 Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, the matter should be referred to the individual's line manager (if an employee) and/or the Head of Centre (in all cases) prior to proceeding.

5.2 As any gift or offer of hospitality could be a potential bribe, to aid transparency and protect the reputation of the company and its employees all offers should be recorded using the Declaration of Gifts and Hospitality Form (appendix 1). This form should be given to the employees' line manager.

5.3 Any gift or offer of hospitality with a value of more than £20.00 should be referred by the line manager to the Head of Centre for a decision on whether it is appropriate to accept the gift and/or whether it should be given to a local charity to benefit the community.

#### 5.4 RED FLAGS

The following is a list of possible red flags that may arise during an employee's employment with the company, which may raise concerns under various antibribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.



# Immerse Training

If an employee, learner or other user of our services encounter any of these red flags they must report them promptly to their line-manager or Head of Centre as appropriate.

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- You learn that a third party has a reputation for paying bribes or requiring that bribes are paid to them.
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a function or process for us.



- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made.
- A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
- A third party requests an unexpected additional fee or commission to "facilitate" a service.
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- A third-party request that a payment is made to "overlook" potential legal violations.
- You receive an invoice from a third party that appears to be non-standard or customised.
- A third party insists on the use of side letters or refuses to put terms agreed in writing.
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- You are offered an unusually generous gift or offered lavish hospitality by a third party

*This policy will be reviewed annually or as amendments are required by law.*

**Appendix 1: Declaration of Gifts and Hospitality Form**

Receiving benefits, gifts, rewards or hospitality in return for providing services (even if these services are part of a usual role) can be perceived as an inducement to show favour to a person or organisation in his or her official capacity. Staff are advised to decline such offers, but it is acknowledged that there may be occasions when this is not feasible. All staff should conduct themselves with integrity, impartiality and honesty at all times and should maintain high standards of propriety and professionalism.

If you have received or wish to declare a gift or hospitality, please complete the form and return to your line manager.

**Details of employee receiving gift or hospitality**

First name	
Surname	
Job Title	
Date of Declaration	

**Description of gift or hospitality**

Description of gift / hospitality	
Value / estimated value of gift / hospitality	
Purpose of the offer	
Person / organisation providing the gift or hospitality	
Relationship (or future r/ship) to the person / organisation offering the gift or hospitality	
Acceptance of gift/hospitality Yes / No	Yes / No
If gift already accepted, explanation why prior approval not sought	

**Approved by**

Signature	
Date	
Name	
Job Title	



Signed:

Date: 02/07/18

1st review of this version due by: 02/07/19

### Reviews

Date	Approved – no changes	Approved – with amendments
02/07/18	M. Hyland – Managing Director	N/A