

Training 4 Dynamics 365 & CRM Ltd - Anti Bribery and Corruption Policy

Training for Dynamics 365 & CRM conducts responsible and fair business practices. Our employees strive for the highest level of ethical standards in all business activities. This document states our policy towards bribery and corruption and the measures taken for its prevention.

Scope

This policy covers all employees and subcontractors working for Training for Dynamics 365 & CRM including those on temporary and fixed term contracts, external resources, agents, distributors, consultants, standards committee members, business partners and any other person or organisation who performs services for or on behalf of the Training 4 Dynamics 365 in any location around the world.

Policy

It is Training 4 Dynamics 365 policy to maintain the highest standards of ethics in all of our business dealings worldwide. Training 4 Dynamics 365 is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships globally. Training 4 Dynamics 365 has a zero-tolerance approach to bribery and corruption.

Training for Dynamics 365 & CRM is bound by the laws of the UK, including the Bribery Act 2010 which governs our conduct both in the UK and worldwide. Training for Dynamics 365 & CRM is also committed to upholding all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

Unacceptable pecuniary advancement, gifts or hospitality

- It is not acceptable for you (or someone on your behalf) to:
- give, 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;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another employee or person working on behalf of or representing BSI who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy

Reporting

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Training for Dynamics 365 & CRM or under our control. All employees and contractors working for Training for Dynamics 365 & CRM are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager or the Managing Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business, you should report this immediately. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Record Keeping

Training for Dynamics 365 & CRM keeps financial records and has appropriate internal controls in place to evidence the business reason for making payments to third parties. Accordingly, you must

ensure that all expenses claims relating to hospitality or gifts incurred by you on behalf of Training for Dynamics 365 & CRM for the benefit of a third party are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. These expenses should be recorded under the Sage accounts line items as Promotional Gifts or Hospitality, as appropriate. In addition, you must declare and keep a written record of all gifts accepted above £60 or equivalent, which will be subject to managerial review. This does not apply to corporate hospitality unless your manager decides that a particular invitation should be recorded.

Educating employees of the 2010 Bribery Act of 2010

Training for Dynamics 365 & CRM have implemented a project to ensure all new staff receive training concerning anti bribery legislation as part of the induction process. The training refers to the legal requirements from the 2010 UK Bribery Act and the responsibilities of employees to comply with the Act.

Monitoring and review

The company will monitor the effectiveness and review the implementation of this policy regularly. Any improvements to the policy will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

This policy does not form part of any employee's contract of employment and it may be amended at any time.