



Zenith Professional Training Ltd

*...providing creative business and management solution*

# GROUP ANTI-FRAUD ANTI-BRIBERY POLICY

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## **Anti-Fraud & Anti-Bribery Policy**

### **Introduction**

Zenith Professional Training Ltd. is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practises. ZPT has a zero-tolerance approach towards such behaviours. The company values its reputation and is committed to maintaining the highest possible ethical standards in its business activities and without the use of corrupt practices or acts of bribery to obtain unfair advantage. This is not just a cultural commitment on the part of the organisation but its' legal obligation.

This policy has been adopted by the Board of Zenith Professional Training Ltd. they attach the utmost importance to this policy, which applies to all employed by the company, agency staff, and contractors. Employees are required to comply with the spirit, as well as the letter of the law and regulations of all countries in which the company operates or hopes to operate, in respect of the lawful and responsible conduct of business.

### **Definitions**

*Fraud:* Wrongful or criminal deception intended to result in financial or personal gain. A person or thing intended to deceive others, typically by unjustifiably claiming or being credited with accomplishments or qualities.

*Bribery:* A bribe is an illegal or unethical gift bestowed to influence the recipient's conduct. It may be money, goods, rights in action, property, preferment, privilege, emolument, objects of value, advantage, or merely a promise to induce or influence the action, vote, or influence of a person in an official or public capacity.

*Corruption:* In general, corruption is a form of dishonesty or criminal activity undertaken by a person or organization entrusted with a position of authority, often to acquire illicit benefit, or, abuse of entrusted power for one's private gain. Corruption may include many activities including bribery and embezzlement, though it may also involve practices that are legal in many countries

### **Objective**

The companies aim is to limit its' exposure to fraud, bribery and other corrupt practises by:

- Setting out clear anti-fraud and anti-bribery policy;
- Training all employees so that they can recognise and avoid the use of fraud and bribery by themselves and others.
- Encourage its employees to be vigilant and report any suspicion of fraud, bribery and other corrupt practises, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged fraud, bribery and other corruption practises and assisting the police and other appropriate authorities in any resultant prosecution.

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- Taking firm and vigorous action against any individual(s) involved in fraud, bribery and any other corrupt practises.

The act of giving and or receiving a bribe are considered by the company to be an act of Gross Misconduct, leading to summary dismissal.

### **The Policy**

The company prohibits the giving, the solicitation or the acceptance of any bribe, weather cash or other inducement:

- To any other person or company, wherever situated or
- Any individual employee, agent or other person acting on the company's behalf
- In order to gain any commercial, contractual or regulatory advantage for the company in any way which is unethical or
- In order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

### **Further Clarification**

The policy prohibits the making, giving or receiving of any inducement which results in 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 interest of the company, or of the person or body employing them, or whom they represent.

This policy in not meant to prohibit the following practises providing that they are customary in a particular market, are proportionate and properly recorded, via the Gift Register maintained by the company officials.

- Normal and appropriate hospitality (given or received)
- The giving of gifts of nominal value
- The use of any recognised fast-track process which is available to all on payment of a fee;
- The offer of recourses to assist the person or body to make a decision more effectively provided that they are supplied for that purpose only and or
- Rewards as part of a loyalty program which is standard industry practise.

Inevitably, decisions as o what is acceptable may not always be easy. If anyone is in doubt as to weather a potential act constitutes bribery, the matter should be referred to your senior manager before proceeding.

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## **Employee Responsibility**

The prevention, detection and reporting of instances of not only fraud, bribery and corruption but also any other suspicious activity or wrongdoing is the responsibility of all employees throughout the company.

## **Raising Concerns and Seeking Guidance**

The company is absolutely committed to ensuring that each employee has a safe reliable and confidential way of reporting any suspicious activity. The company has safe channels of communication in place, for the purpose of reporting any such wrongdoing or activity.

For any additional information or clarity as to whether a potential act would constitute fraud or bribery please contact the senior management of the company.

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