

Anti-Bribery Policy

Purpose

This Policy establishes principles that must govern our conduct in order to: a) conform to the the UK Bribery Act, U.S. Foreign Corrupt Practices Act (FCPA), and similar anticorruption laws worldwide and b) more broadly, reinforce the intention and obligation to act honestly and ethically in all business dealings.

Scope

This policy applies to all StudyIn, Study International and subsidiary employees globally.

The StudyIn policy concerning bribery applies to all business clients such as HEI, FE staff, student clients, franchises, partners, landlords, contractors, & service providers... etc); and to government employees.

Responsibility for Policy

The compliance committee (the Global Directors and the Head of Compliance Asher Javed) are the final authority to this policy. Asher Javed is located in the London UK office and any queries or concerns on this policy can be directed to him.

Policy Statement

Bribery and corruption are not only against our company values; they are illegal and can expose both the employee and company to fines and penalties, including imprisonment and reputational damage.

At StudyIn, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity. Employees and representatives of the Company are expected to decline any opportunity which would place our ethical principles and reputation at risk.

While certain laws apply only to bribes to government officials (domestic and foreign); this Policy applies to non-government business partners, such as our university clients, partners, student clients and franchises as well.

What is Bribery and Corruption?

Bribery is offering, giving or receiving anything of value with the intention of inducing a person to act or to reward a person for having acted. It is important to understand that a corrupt act has occurred even if:

- A bribe does not succeed.
- A person authorizes or provides direction for a bribe but no bribe is ultimately offered or paid.

Anything of value" includes, but is not limited to:

- Cash, cash equivalents (such as gift certificates/cards), stock, personal property and assumption or forgiveness of a debt.
- Gifts, meals, entertainment and travel – Any corporate travel, gifts, entertainment and meals must be proportionate to the occasion and comply with the gift & entertainment policy/standards applicable to your location.
- Political contributions.
- Charitable contributions – if made to a charity at the direct request of a government official or private business partner, it could be considered an indirect bribe made in order to obtain or retain business or to secure other improper business advantage.
- Job offers or internship awards – offers to Government Officials (or their relatives) can present a risk of violating anti-bribery or anticorruption laws and regulations. Compliance must be consulted prior to making such offers.

Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery.

Third Parties

Companies cannot avoid liability by using a third party to give or receive a bribe. A third party includes, but is not limited to consultants, agents, representatives, subcontractors and subadvisors.

We must clearly convey to third parties representing the Company that we expect them to comply with our Bribery and Corruption Policy.

Government Officials

Laws and regulations are strict when dealing with Government Officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when Government Officials are involved.

Some laws allow expenses which relate to reasonable and bona fide travel, accommodation and meal expenses in connection with a contract between the Company and the third party, or the demonstration of Company capabilities relating to proposed business with the third party.

Facilitation Payments

“Facilitation or grease payments” are payments that facilitate a normal governmental function, such as to expedite processing paperwork. While these types of payments may be accepted as “a cost of doing business” in some cultures, they are illegal and counter to our values. They are not allowed under the UK Bribery Act and they are prohibited by this policy.

Reporting Violations

Employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law. If you are offered a bribe from a person or entity doing business with or seeking to do business with the Company, report it immediately to your manager.

