



British School
Quito
an Orbital Education School

All our policies are developed to ensure our values are at the centre of all we do, as we work in the best interests of our pupils to ensure the best outcomes for them. All policies can be updated out with the set review cycle if advice, guidance, or new learning require it.

Excellence
Excelencia

Respect
Respeto

Responsibility
Responsabilidad

Integrity
Integridad

Compassion
Compasión

We live and learn together:

1. with **respect** and **care** for each other
2. with a **happy** and **welcoming** attitude to everyone
3. with an **active** and **determined** approach to our ambition

Anti Bribery and Corruption Policy

Adopted: Monday, 08 September 2025

Review cycle: 2 Year review cycle.

Next review: Wednesday, 08 September 2027

Policy Lead: Principal.

Published: Policy SharePoint: ✓ BSQ Website: ✓



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Scope of this policy

This anti-bribery policy exists to set out the responsibilities of the British school Quito as part of the Orbital Education Group and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for us. It helps all colleagues recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy Statement

The British School Quito as part of Orbital Education Group is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. We adopt a zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships.

We will constantly uphold all laws relating to anti-bribery and corruption in Ecuador. All colleagues are guided by the 7 principles of public life:

1. Selflessness
2. Integrity
3. Objectivity
4. Accountability
5. Openness
6. Honesty
7. Leadership

Who is covered by the policy

This anti-bribery policy aligns fully with that of Orbital and applies to all employees, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us. The policy also applies to Officers of the British School Quito Foundation,

Any arrangements we make with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another in order to gain commercial, contractual, regulatory, or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a public official. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from our RHoS.

What IS and what is NOT acceptable

This section of the policy refers to 4 areas:

- a. Gifts and hospitality.
- b. Facilitation payments.
- c. Political contributions.
- d. Charitable contributions.

Gifts and hospitality

We accept normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.

- a. It is not made with the suggestion that a return favour is expected
- b. It is in compliance with local law
- c. It is given in the name of the company, not in an individual's name
- d. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate)
- e. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you for helping with a significant project upon completion)
- f. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift
- g. It is given/received openly, not secretly

- h. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them
- i. It is not above a certain excessive value, as pre-determined by the relevant RHoS (usually in excess of \$100)
- j. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the relevant RHoS

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the relevant RHoS, who will assess the circumstances.

As good practice, gifts given and received (usually in Excess of \$100) should always be disclosed to the RHoS. Gifts from suppliers should always be disclosed. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the relevant RHoS should be sought.

Facilitation Payments and Kickbacks

We do not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

We do not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Political Contributions

At BSQ we will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Charitable Contributions

We accept the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agree to disclose all charitable contributions made.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the relevant RHoS.

Employee Responsibilities

As an employee of BSQ, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the relevant RHoS.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. We maintain the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- a. How to raise a concern
- b. What to do if you are a victim of bribery or corruption
- c. Protection

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to BSQ, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the Principal or our RHoS, a director or Group We will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

What to do if you are a victim of bribery or corruption.

You must tell the principal or RHoS as soon as possible:

- a. if you are offered a bribe by anyone
- b. if you are asked to make one
- c. if you suspect that you may be bribed or asked to make a bribe in the near future
- d. if you have reason to believe that you are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, we understand that you may feel worried about potential repercussions. We will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

We will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised. If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, the principal or our RHoS immediately.

Training and Communication

We will ensure this policy is available to all staff to read and will answer any questions raised by them.

Our anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

Record keeping

BSQ will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and Reviewing

This policy is on a two-year review cycle, but we will update as required to ensure our policy aligns with Orbitals global policy.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.