

Anti-Bribery Policy

Introduction

Central School of Ballet ("**Central**") is committed to maintaining the highest standards of business behaviour in our dealings with our students, staff, funding organisations and the communities in which Central works. As part of that commitment, it is important that we understand and comply with the Bribery Act 2010.

Central has a clearly-defined zero-tolerance policy against all forms of bribery and corruption and its overriding policy is to prohibit bribery and corruption, either directly or indirectly through third parties, in any form, in all of its operations.

This Policy applies to and must be complied in full by all patrons, governors, staff and students (existing and potential) ("**Central Personnel**") of, and advisers, contractors, consultants and agents ("**Third Parties**") to, Central.

The purpose of this Policy is to: (i) set out the responsibilities of Central Personnel and Third Parties in observing and upholding Central's position on bribery and corruption; and (ii) provide guidance on how to recognise and deal with potential bribery and corruption issues in order to ensure compliance with all applicable legal obligations.

The Bribery Act 2010

Under the Bribery Act, a bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. The Bribery Act contains four new criminal offences: (i) giving or offering a bribe; (ii) soliciting or receiving a bribe; (iii) giving or offering a bribe to a foreign governmental official; and (iv) a corporate offence of failing to prevent bribery by an associated person for the organisation's benefit.

The penalties set out in the Bribery Act apply to both organisations and all individuals. Organisations and individuals convicted under the Bribery Act face unlimited fines and individuals may also face up to ten years imprisonment. If convicted of or implicated with a bribery offence, Central could suffer lasting reputational damage.

Bribes and Inducements

No member of Central Personnel or any Third Party must, at any time, make, offer, agree to make or accept any bribe, inducement or improper payment.

Gifts and Hospitality

No member of Central Personnel or any Third Party must give, offer, solicit or accept any gift, hospitality or other inducement which could be construed as being offered or accepted in the belief that some financial or other advantage could be gained.

Central recognises that bona fide gifts, hospitality and promotional expenditure which are reasonable, proportionate, not given or received with an illegal intention and undertaken to present services or establish or maintain good relations with affiliates or external organisations (for example invitations to performances or other events) are not subject to the strictures of this Policy. However, it is important that when giving or receiving gifts or hospitality, consideration is given as

to: (i) the intention behind such gift and/or hospitality; and (ii) whether such gift and/or hospitality is normal and appropriate.

If any member of Central Personnel or any Third Party is unsure whether any proposed gift or hospitality constitutes bribery or corruption, they should seek advice from the Director of Central

Notwithstanding the exception for "bona fide" gifts and hospitality referred to above, all gifts or hospitality (proposed to be given or received) with a value exceeding £20.00 must receive prior approval from the Director of Central and entered into Central's Register of Gifts and Hospitality.

Raising concerns

If any person to whom this Policy applies knows or has reason to believe that there has been a breach of this Policy, they must report the incident to the Director of Central. Liability under applicable anti-bribery and anti-corruption laws will not be avoided by ignoring or "turning a blind eye" where circumstances indicate a possible breach of this Policy.

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