



# Anti-Bribery and Anti-Corruption (ABC)

## Anti-Bribery and Anti-Corruption Policy Statement

As a leading childcare provider, we insist on upholding the highest standards and ethics at every level of our business, and in every country where we have business interests, irrespective of local practices. We are committed to act with integrity, honesty and transparency at all times, to uphold our ethical standards and to protect our reputation. Our ABC policy represents our intention to act with integrity and our commitment to do what is right.

This means that anyone working for or on behalf of Busy Bees or in partnership must never solicit, accept, agree to receive, promise to offer to give a bribe, facilitation payment, or any other improper payment, gift or favour.

Busy Bees will not engage in any bribery or corruption in any form and has a zero tolerance approach to any breaches of this policy regardless of the circumstances.

---

**We have an obligation to operate to the highest standards in everything we do. Our Code of Conduct sets out the expectations and behaviours expected from all employees. You must always operate fairly and ethically in all areas of the business to maintain our reputation and status as a global leader.**

## Our Vision

To give every child the best start in life

## Our Mission

Deliver high quality childcare and exciting opportunities for learning that give every child a head start as they prepare for school

## Our Core Values

- Care** We take care very seriously
- Service** We are an integral part of parents' support network
- Quality** We set and maintain the highest standards, it's what children and parents deserve
- Value** We ensure that we provide outstanding value for money

# Anti-Bribery and Anti-Corruption



## Who does this apply to?

Our ABC Policy is mandatory and applies to all members of the board, senior executives and employees, our suppliers and companies we do business with including family members, third-party agents and joint venture partners. There is no situation where this policy does not apply.

## Your commitment to this Policy

You must take time to read and understand the principles and expectations set out in this document. If you don't understand what is expected of you, ask your line manager for clarification. Whether you are employed by Busy Bees, or you are a supplier, contractor or partner of Busy Bees you must:

- Always adhere to the requirements of this policy
- Seek guidance and advice if you are in doubt
- Report any suspected breaches of the anti bribery and corruption policy or procedure whether committed intentionally or unintentionally by you or others

## Guidance

We appreciate that good relationships with our parents, business partners and associates are an essential part of what we do. However, we must ensure that every member of staff can identify what is acceptable and what is not.

You must avoid impropriety by not accepting gifts in exchange for influence.

In order to comply with anti-corruption laws, you must never directly or indirectly, offer or accept an offer of a bribe, which is a payment or gift in return for access, influence or personal gain. This is strictly prohibited. Bribery can occur in both the public

and private sectors. The person receiving the bribe is usually in a position to influence the award or the progress of business, sometimes a government or other public official. It can also be an offence to fail to prevent bribery by those acting on our behalf.

We will not penalise anyone who loses business through not paying a bribe.

No-one in Busy Bees must threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

## What is a bribe?

A bribe is anything offered, given, promised, requested or received to gain any commercial, contractual, regulatory or personal advantage.

This may include the following:

- A free childcare place
- Undocumented cash payment received or given to an individual or government official
- Unrecorded travel or accommodation expenses
- A contribution to a public official's chosen charity
- Uncompensated use of the company's facilities, services or property
- An internship or job, or preferential treatment in our hiring processes for an individual or member of their family
- A promise of future employment or business

- A gift, meal or hospitality may constitute a bribe if this is exceptionally costly or if given for the purpose of gaining advantage

You must not:

- Give, offer, solicit, extort, request or accept, directly or indirectly, anything that is or could reasonably be considered as a bribe
- Act as a mediator for a third-party in advancing any of the above acts
- Pay any 'facilitating' or 'grease' payments

You are encouraged to speak up if you know of, or suspect:

- A breach of the ABC Policy
- An offer or request by a third-party for anything that is, or could be reasonably considered a bribe

There are occasions where gifts are permitted which would include:

- Gifts of low value usually bearing the company logo (diaries, pens, umbrellas etc.)
- Gifts of low value (not including cash) given at festive seasons or birthdays
- Business meals provided they are on a modest scale and infrequent
- Occasional invitations to corporate hospitality



# Anti-Bribery and Anti-Corruption



We expect you to exercise good judgment and common sense when considering these issues, so as to not damage the integrity of Busy Bees and expose us, and our staff and representatives, to the risk of sanctions such as fines and imprisonment.

Giving or accepting gifts or favours in return for any preferential treatment is not acceptable. In some cases you may be told that, unless we pay bribes we will not win business, for example. That does not matter. If we were to be involved in even one instance of bribery or corruption, we would have shown that we engage in such conduct. We do not. All of your business expenses should be properly documented in an expense report.

Even if you are not seeking reimbursement for your expenses, the details in this policy still apply to meals, entertainment and gifts, as well as reporting.

## Indicators of corruption and bribery

Common indicators of bribery and corruption include the following (there may well be others too):

- Payments for abnormal amounts or purposes (e.g. commission), or made in an unusual way, e.g. what would normally be a single payment is made in stages, through a bank account never previously used, or in a currency or via a country which has no connection with the transaction
- Process is bypassed for approval or sign-off of terms or other commercial matters, or we are prevented from or hindered in monitoring commercial processes
- Individuals are secretive about certain matters or relationships and/or insist on dealing with them personally; they may make

trips at short notice without explanation, or have a more lavish lifestyle than expected

- Decisions are taken for which there is no clear rationale
- Records are incomplete or missing

## Use of third-parties

If you are responsible for agreements with third-parties, who act on our behalf, you must ensure that they always operate in accordance with this policy.

You are responsible for:

- Evaluating each third-party and determining whether there are specific risks
- Ensuring appropriate controls are implemented to monitor and control the risk
- Reporting identified risks to your CEO
- Ensuring that the third-party is aware of the Busy Bees ABC policy and agrees in writing to abide by it

## Pre-acquisition diligence

We must also ensure that our work around acquisition of external contracts is conducted fairly. It is essential that Busy Bees does not engage in any illegal or unethical activity.

Before any acquisition takes place, Operations team should be consulted to:

- Advise on the appropriate risk-based due diligence required
- Recommend whether anti-corruption representations and warranties should be included in the purchase agreement
- Recommend a process for carrying out additional risk-based internal controls

## Charitable and political contributions

### Political

Busy Bees does not make contributions or donations to political organisations or independent candidates. You may, of course, exercise your personal right to make political donations, provided they are not for business advantage.

Our work with charities is something we are incredibly proud of. Due to our business structure, Busy Bees supports several charities and a number of local causes throughout the year. Bribes can be disguised as charitable donations. Under no circumstances should charitable donations be made in exchange for favours.

All charitable contributions must be publicly disclosed.

## Accurate records and internal controls

It is essential that we keep full and accurate records of all our financial dealings. Transparency is vital; false or misleading records could be very damaging to Busy Bees. The accuracy of our records and transparent presentation of financial and other information supports our ethical standards integrity and professionalism. If your role involves reporting we expect that you act honestly and with integrity, avoiding conflicts of interest in your personal and professional relationships. You should always provide full, fair and accurate reports in a timely manner and understand the legal obligations of accurate accounting.



# Anti-Bribery and Anti-Corruption



Busy Bees will always maintain precise and complete financial accounts and records, compliant with all relevant laws and regulations and will never knowingly falsify documents.

## Failure to comply

We take compliance with this policy very seriously. Failure to comply puts both you and Busy Bees at risk. You may commit a criminal offence if you fail to comply with this policy. Criminal law relating to bribery and corruption carries severe penalties. Any employee who falls short of the expectations in this policy can expect to be subject to disciplinary action, up to and including termination of employment for gross misconduct.

## Monitoring

Everyone must observe this policy. It will count for nothing unless we do. The CEO has overall responsibility for this policy. They will monitor it regularly to make sure it is being adhered to. In doing this they act in the interest of Busy Bees as a whole, and it is therefore the responsibility of all of us to help them in this. The CEO will report regularly to the Board on compliance with this policy.

## What to do if you have a query or concern

Each of us has a responsibility to speak out if we discover anything corrupt occurring in relation to Busy Bees. We cannot maintain our integrity unless we do this. If you require any further information of how the ABC Policy and Procedure applies to you, then you should contact your line manager for guidance. If you believe that the ABC Policy and Procedure has been or is being

breached, you have an obligation to report your concerns. You must make your report as soon as reasonably practicable. You may be required to explain any delays.

In the first instance you should raise any concern that the ABC Policy and Procedure has been breached with your line manager or through Speak Up. Your manager will make an initial assessment of any potential breaches of the ABC Policy and Procedure, and any ethical or professional misconduct, which are reported to them. Where it appears that a breach may have occurred, your manager will report the matter to a member of the senior executive team.

If you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should report the matter using Speak Up.

