

# ANTI-BRIBERY & CORRUPTION POLICY

## About Maitri Studio

Maitri Studio Ltd is a small limited company with only Directors Claire Ferry & Geoffrey Moore and freelance administrative help, a cleaner, accountant and yoga teachers providing cover. Other users of Maitri Studio are freelance teachers and therapists who hire rooms from us (henceforth “freelancers”). While we have no direct employees, we here set out our position in relation to anti-bribery and corruption matters and to state Maitri Studio’s commitment to high legal, ethical and moral standards, in line with our business values.

This document will be reviewed and updated annually, or upon any major changes in the workplace should we become a larger organisation, including if we become an employer.

## What is bribery and corruption?

“Bribery” is the receiving, offering, giving, providing, requesting or accepting of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something which is dishonest, illegal or a breach of trust, in the conduct of Maitri Studio’s business.

“Bribery” for this purpose includes so-called “facilitation” or “grease” payments, defined as non-discretionary payments made to government or public officials to speed up routine administrative processes, even if such payments are nominal in amount.

“Corruption” is the misuse of entrusted power/breach of duty for personal gain.

## How will Maitri Studio deal with bribery and corruption?

We will take appropriate steps to ensure that we:

1. do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage;
2. do not offer, nor give in to demands to make, illicit or illegal payments to agents, public officials (at whatever level), or the employees of business partners or anybody else that we do business with;
3. engage and remunerate agents and other third parties only for legitimate services and adopt appropriate transparency in our approach;
4. promote awareness of, and compliance with, this policy by sharing it with all freelancers using Maitri Studio;

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5. adopt work systems that discourage bribery and corruption, and financial and tax accounting and auditing practices that prevent the establishment of “off the books” secret accounts or the creation of documents which do not properly and fairly record the transactions to which they relate;
6. do not make illegal or inappropriate contributions to candidates for public office or to political parties or to other political organisations;
7. raise awareness of the need to combat bribery and corruption with our business partners by publication of this policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption;
8. do not offer or accept any gifts or hospitality to or from clients, contractors, suppliers, other third parties or public officials. For the purposes of this policy:
  - a. Gifts include but are not limited to presents such as flowers, vouchers, food and drink, event and travel tickets when they are not to be used in a hosted business context.
  - b. Hospitality includes but is not limited to invitations to hosted meals, receptions and events for business purposes.
9. do not offer money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a ‘facilitation payment’ and is illegal. We ask all freelancers and anyone else associated with Maitri Studio that if faced with a demand for a facilitation payment they will:
  - a. actively resist the payment;
  - b. inform Maitri Studio directors.

### **SUMMARY**

The aim of this policy is that Maitri Studio Ltd, its agents, employees, sub-contractors, suppliers and business partners will never seek, accept or give a bribe, facilitation payment, or other improper payment. Maitri Studio Ltd will ensure that we operate with appropriate transparency in all our business dealings and in accordance with our ethics and values.

Further information in relation to committing bribery and corruption can be found at: <http://www.legislation.gov.uk/ukpga/2010/23/contents>.

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Agreed, signed and dated



CLAIRE FERRY (director)  
23 April 2018



GEOFFREY MOORE (director)  
23 April 2018

Review date: 22 April 2019