

Policy: Anti-slavery and Corruption Policy			
Cognition World Policies – Version Control:			
Version	Author	Date	Change / Update
1.0	TDM	Q2 2019	n/a
2.0	TDM	Q4 2022	Align with obligations: Companies Act (2014), Criminal Justice (Corruption Offences) Act 2018, Criminal Law (Human Trafficking) Act 2008, as amended by the Criminal Law (Human Trafficking) (Amendment) Act 2013, UK Modern Slavery Act (2015), Protected Disclosures Act 2014 and Protected Disclosures (Amendment) Act 2022.
2.1	TDM	Q1 2025	Updated link to Anti-Bribery Guidance for Transparency International

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1- Context

This Anti-slavery and Corruption policy sets out our position on bribery, corruption, modern slavery, human trafficking and other wrong doings. It provides guidance on how we recognise corruption in its various guises. The policy is crucial as it demonstrates our commitment to:

- Our ethical and legal obligations and compliance with applicable laws and regulations.
- Combating modern slavery and human rights violations.
- Preventing bribery and corruption or improper influence.
- Reducing risk by scrutinising our supply chain for product origin & labour practices.
- Contributing to a more just world and supporting international standards.

2- Purpose

This policy:

- sets out our responsibilities in observing and upholding our position on bribery, corruption human trafficking & modern slavery (encompassing servitude, forced or compulsory labour).
- applies to our corporate “ecosystem” as those working for and on behalf of Cognition World including all persons or firms with whom the company contracts (eg contractors and agents).
- is a contractual requirement for anyone in our ecosystem.
- requires compliance in accordance with other specified policies.
- sets out our expectations to our ecosystem on how to recognise and deal with the above.

3- Cognition World’s 10 Anti-slavery and Corruption Principles

- It is our policy to conduct all business dealings with honesty, fairness and openness.
- We commit to acting professionally & with integrity in all dealings and relationships.
- We conduct business ethically and in compliance with all applicable laws and regulations.
- Nobody within of our eco-system may give or accept a bribe, directly or indirectly.
- We actively promote – from the top down - a culture whereby bribery is never acceptable.
- We take a zero-tolerance approach to bribery & corruption in all dealings and relationships.
- We all commit to implementing and enforcing systems to counter bribery and corruption.
- All who work for us are required to always observe the utmost standard of ethics.
- We explicitly condemn modern slavery and human trafficking as human rights violations.
- We conduct due diligence to assess the risks above within our supply chain.

4- Modern Slavery Prevention Measures:

Our measures to prevent and detect modern slavery and human trafficking.

1. We embrace Hope For Justice’s resources on [Spot the Signs of Modern Slavery](#)
2. It is obligatory for all employees and our ecosystem to:
 - a) understand their role in preventing modern slavery
 - b) study any information required for them to be aware of their obligations.
3. We conduct due diligence within our operations and supply chain to identify and assess:
 - potential risks of modern slavery and human trafficking
 - transparency and collaboration with suppliers
 - adherence to ethical standards and legal requirements
4. We take appropriate action against any party involved in modern slavery, including contract termination and in extreme cases, legal proceedings.

5- Anti-Bribery & Corruption Measures:

- 1) We stress integrity and transparency in all business dealings and relationships.
- 2) We prohibit any form of direct or indirect bribery, corruption, or improper influence.
- 3) We provide guidance to recognise bribery and corruption from [Transparency International](#)
- 4) We enforce this anti-bribery policy to prevent bribery in all aspects of business operations.
- 5) We remind our eco-system how bribery & corruption includes any attempt to engage in any of the below or to conceal or destroy information relating to any of the below
- 6) We prescribe bribery & corruption as:
 - a. Defrauding or stealing by any means (eg fraudulently recording working time, false expenses).
 - b. Giving or accepting a gift (e.g. a voucher) or other form or reward in return for:
 - i. sharing confidential information
 - ii. knowing it will be used to facilitate an offence
 - iii. favourable commercial negotiations/tendering or to influence the outcome.
 - c. Corruptly creating, using or knowing of false statements, documents, texts for:
 - i. inducing someone to do an act, or prejudice them, in relation to their employment.
 - ii. false accounting or forgery, such as altering documents or e-signatures (e.g. invoices)
 - d. Threatening a person with the intention of corruptly influencing that person or another person to do an act in relation to that person's employment.

6- Raising a Concern

- At the earliest possible opportunity, every staff member has a duty to report any suspected or actual incident that he or she becomes aware of:
 - a) bribery or corruption
 - b) modern slavery/human trafficking
- Employees must report any such incident in the first instance to the CEO.
- Contractors/ 3rd parties, must report such incidents to our Chief Commercial Officer.

7- Enforcement

- Any action in breach of this policy:
 - a) by an employee: is a disciplinary matter and disciplinary procedures may result in penalties up to and including dismissal.
 - b) by a contractor: may result in contract termination between the relevant party.
- In the case of either of the above:
 - c) we may take action to recover any losses incurred including civil and/or criminal proceedings against the employee / contractor concerned.
 - d) we may report to the police or other authority, where required to do so.

8- Examples of Bribery & Corruption

1. An employee insists on dealing with a particular supplier him/herself or vice versa
2. 3rd party has a reputation for, engaging in, or has been accused of:
 - a) improper business practices

- b) requiring / paying bribes
 - c) having "special relationships" with officials.
3. 3rd party insists on, before committing to contract /function or carry out a process for us:
- a) receiving a commission or requests a fee to "facilitate" a service.
 - b) requests payment in cash or refused to provide an invoice/receipt.
 - c) refuses to sign a formal fee agreement.
 - d) requests that payments are made to a different geographic location
 - e) demands lavish entertainment or gifts
 - f) a payment is made to "overlook" potential legal violations.
 - g) providing employment or some other advantage to a friend or relative.
4. You receive from a third-party:
- a) An invoice that appears to be non-standard or customised.
 - b) A 'side letter' or a refusal to put terms agreed in writing
 - c) An invoice for a commission/ payment that appears large given the service stated
 - d) A request of the use of an intermediary that is not typically known to us.

9- Examples of Modern Slavery/Human Trafficking

1. You become aware that a worker/contractor operating in our business or supply chains:
- a) Appears to be under the control of someone else and is reluctant to interact with others.
 - b) Has few personal belongings, wears unsuitable work clothes or same clothes every day
 - c) Appears to be working excessive hours.
 - d) Appears not to be able to move around freely, or access to personal identification.
 - e) Is reluctant to engage with you or colleagues.
 - f) Appears frightened or withdrawn or shows signs of physical or psychological abuse.
 - g) Is dropped off / collected in the same way, especially at unusual times
 - h) Lacks basic training and protective equipment for the work undertaken.
2. A third party supplier is unable to:
- a) demonstrate supply chain transparency in a tendering process.
 - b) provide/disclose its human trafficking measures when requested.
 - c) prove they are not linked to modern slavery/human trafficking violations.