1. **Purpose**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery,conflict of interestand corruption regulations, and to ensure that the Company’s business is conducted in a law-abiding manner.

**2. Policy Scope**

**2.1** This policy applies to all employees including consultants, contractors, trainees, seconded staff, casual workers, or any other person or persons associated with Atlas Training Services.

 **3.3** Any arrangements Atlas Training Services makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with the minimum requirements of our policy.

**3. Policy statement**

**3.1** Atlas Training Services is committed to conducting all business aspects in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. Atlas Training Services has zero-tolerance for bribery and corrupt activities.

**3.2** Atlas Training Services will constantly uphold all laws relating to anti-bribery, conflict of interest and corruption in all the jurisdictions in which we operate.

**3.3** Atlas Training Services recognises that bribery, conflict of interest and corruption are punishable by the law. If our company is discovered to have taken part in corrupt activities, we may be subjected to legal consequences, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

**4. Definitions**

**4.1** 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.

 **4.2** A bribe refers to any inducement, reward, item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

 **4.3** 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.

**4.4** Conflict of interest may occur whenever an employee’s interest in a particular subject may lead them to actions, activities or relationships that undermine the company and may place it to disadvantage this might include any of the following:

 - Employees’ ability to use their position with the company to their personal advantage

- Employees engaging in activities that will bring direct or indirect profit to a competitor

- Employees owning shares of a competitor’s stock

- Employees using connections obtained through the company for their own private purposes

- Employees using company equipment or means to support an external business

 **5. Raising a concern**

If you suspect that there is an instance of bribery, Conflict of interest or corrupt activities occurring in relation to Atlas Training Services, you are encouraged to raise your concerns at as early 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 or the managing the director.

**6. Protection**

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

**6.2** Atlas Training Services top management 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.

 **6.3** Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual rose.

**6.4** 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 or the managing director immediately.

**7. Third-party management**

**7.1** Third parties include service providers, suppliers, agents, consultants, and other partners. Cooperation between Atlas Training Services and third parties must be authentic and legitimate. Atlas Training Services requires its partners to comply the principles of honesty and integrity, and this Policy.

**7.2** Atlas Training Services believes that due diligence, complete agreement clauses, and corresponding control procedures are key to ensuring that third parties comply with Atlas Training Services Anti-bribery Policy.

**7.3** Third parties are forbidden from paying bribes on behalf of Atlas Training Services or when working with Atlas Training Services in any capacity. This prohibition includes bribes in the form of gifts or hospitality offered to Atlas Training Services employees.

**8. Training and communication**

 **8.1** Atlas Training Services will provide training on this policy as part of the induction process for all new employees. Employees will also receive refresher training on how to adhere to this policy during regular staff meetings.

**8.2** Atlas Training Services’ 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.

**9.1 Record keeping**

**9.1** Atlas Training Services will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made., Atlas Training Services is basing its policy on not accepting or offering gifts and acts of hospitality, but understand that gifts and acts of hospitality are subject to top managerial review and consent if required.

**10. Monitoring and reviewing**

**10.1** Atlas Training Services Managing Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis.

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

 **10.3** 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 managing director.