

Introduction

Aberdeen Skills and Enterprise Training Ltd (**ASET**) recognises that bribery and corruption has a detrimental effect on communities wherever they occur. Bribery is a criminal offence in most countries in which ASET operates, and corrupt acts expose ASET and its employees to the risk of prosecution, fines and imprisonment, as well as endangering the Company's reputation. It is ASET's policy to comply with all anti-bribery and corruption laws of the UK or any nation in which we do business.

With the introduction of the UK Bribery Act 2010, ASET has taken steps to introduce "adequate procedures" which are rigorously applied and reviewed to ensure that we are fully compliant with the provisions of the Bribery Act.

It is ASET's policy to maintain the highest level of ethical standards in the conduct of its business affairs and ASET has a zero tolerance of bribery and corruption. This policy has been adopted by the ASET's board and is to be communicated to everyone involved in our business to ensure their commitment to it.

Scope

ASET's zero tolerance of bribery and corruption applies to all officers, directors and employees as well as any agents, contractors, representatives or other parties acting on behalf of the ASET in any country that we operate.

ASET expects our business partners, suppliers and contractors to act with integrity and without thought or actions involving bribery and/or corruption and will, where appropriate, include clauses to this effect in relevant contracts.

The Statement

ASET *prohibits:*

the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement

to or from

any person or company, wherever they are situated and whether they are a public official or body or private person or company

by

any individual employee, agent or other person or body acting on ASET's behalf

in order to

gain any commercial, contractual or regulatory advantage for ASET in a way which is unethical

or in order to

gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibits any inducement which results in a personal gain or advantage to the recipient or any person or body associated with them, and which is intended to influence them to take action which may not be solely in the interests of ASET or of the person or body employing them or whom they represent.

ASET in its ongoing efforts to keep its high ethical standards and with a view to upholding its position against any form of bribery has implemented:

- A clear Anti-Bribery and Corruption Policy
- Training for all employees so that they can recognise and avoid the use of bribery by themselves and others.
- Suitable channels of communication which encourage our employees to be vigilant and to report any suspicion of bribery and ensure sensitive information is treated appropriately.
- Rigorous investigating procedures for instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution.
- Procedures for taking firm and vigorous action against any individuals involved in bribery.

Expectations of ASET and Staff

The prevention, detection and reporting of bribery and corruption is the responsibility of all employees throughout ASET. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained

The Chief Executive has lead responsibility for policy implementation within ASET and this policy is signed by the CEO to demonstrate the Board's commitment.

(signed) Atholl Menzies

Chief Executive

Aberdeen Skills and Enterprise Training Limited

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