SURKOVSKY CENTRE LTD

ANTI-BRIBERY AND CORRUPTION POLICY
Bribery Prevention, Ethical Conduct and Anti-Corruption Framework

Document Number:	ABC-001
Document Title:	Anti-Bribery and Corruption Policy
Document Classification:	Internal Governance Document
Company:	Surkovsky Centre Ltd
Registered Office:	London, United Kingdom
Version:	1.0
Effective Date:	1 August 2026
Review Date:	1 August 2027
Document Owner:	Director
Approved By:	Board of Directors
Document Status:	Approved

Document Control

Document No.	Version	Issue Date	Review Date
ABC-001	1.0	1 August 2026	1 August 2027

Contents

Introduction

Surkovsky Centre Ltd is committed to conducting its activities honestly, ethically, transparently and in accordance with applicable law.

Bribery and corruption undermine trust, distort legitimate decision-making, damage organisations and institutions and may constitute serious criminal offences.

The Company adopts a zero-tolerance approach to bribery and corruption in connection with its activities.

No business opportunity, contract, partnership, research activity, educational arrangement, financial benefit or other organisational advantage justifies bribery or corrupt conduct.

This Policy establishes the Company's framework for preventing, identifying, reporting and responding to bribery and corruption risks.

---

2. Purpose

The purpose of this Policy is to:

- establish the Company's zero-tolerance approach to bribery and corruption;
- support compliance with the Bribery Act 2010 and other applicable legislation;
- establish proportionate procedures designed to prevent bribery;
- identify prohibited conduct;
- establish responsibilities for preventing bribery and corruption;
- provide guidance concerning gifts, hospitality, payments, donations and sponsorship;
- establish expectations concerning third parties and associated persons;
- support appropriate due diligence;
- establish procedures for reporting concerns;
- protect the integrity and reputation of the Company;
- support ethical decision-making;
- promote a culture of honesty, transparency and accountability.

---

3. Scope

3.1 Persons Covered

This Policy applies, as appropriate, to persons acting for, on behalf of, or in connection with Surkovsky Centre Ltd, including:

- directors;
- employees;
- workers;
- consultants;
- contractors;
- agents;
- intermediaries;
- representatives;
- researchers;

- educators and trainers;
- project personnel;
- volunteers;
- persons providing services for or on behalf of the Company;
- other associated persons where applicable.

3.2 Business Relationships

The principles of this Policy may also be relevant to relationships with:

- suppliers;
- service providers;
- academic institutions;
- research partners;
- educational organisations;
- professional bodies;
- conference organisers;
- sponsors;
- publishers;
- clients;
- other business or institutional partners.

3.3 Geographic Scope

This Policy applies to Company activities in the United Kingdom and, where relevant, activities conducted internationally.

Individuals acting for or on behalf of the Company shall comply with applicable anti-bribery and anti-corruption requirements regardless of where the relevant activity takes place.

---

4. Legal and Regulatory Framework

4.1 Bribery Act 2010

The principal UK legislation governing bribery relevant to this Policy is the **Bribery Act 2010**.

The Act establishes offences relating to:

- offering, promising or giving a bribe;

- requesting, agreeing to receive or accepting a bribe;
- bribery of a foreign public official;
- failure of a commercial organisation to prevent bribery by associated persons in circumstances covered by the Act.

4.2 Corporate Prevention

Surkovsky Centre Ltd recognises the importance of maintaining proportionate and effective procedures designed to prevent persons associated with the Company from engaging in bribery.

The Company's prevention framework shall have regard, where appropriate, to recognised principles concerning:

- proportionate procedures;
- top-level commitment;
- risk assessment;
- due diligence;
- communication and training;
- monitoring and review.

4.3 Other Applicable Requirements

The Company shall also have regard to other applicable:

- criminal law;
- fraud legislation;
- financial and accounting requirements;
- corporate governance requirements;
- contractual obligations;
- regulatory requirements.

Where activities are undertaken outside the United Kingdom, relevant local anti-bribery and anti-corruption laws may also apply.

4.4 Higher Standard

Where different legal or contractual requirements apply to a particular activity, the Company shall seek to comply with the applicable requirements and shall not knowingly adopt a standard that would result in unlawful conduct.

---

5. Policy Statement and Zero-Tolerance Approach

5.1 Zero Tolerance

Surkovsky Centre Ltd does not tolerate bribery or corruption.

No person acting for or on behalf of the Company shall:

- offer a bribe;
- promise a bribe;
- give a bribe;
- request a bribe;
- solicit a bribe;
- agree to receive a bribe;
- accept a bribe;
- authorise another person to engage in bribery;
- knowingly facilitate corrupt conduct.

5.2 No Business Justification

Bribery shall not be justified by:

- commercial pressure;
- local custom;
- competitive pressure;
- financial benefit;
- urgency;
- instructions from another person;
- fear of losing a contract;
- desire to obtain preferential treatment;
- established practice within a particular market.

5.3 Indirect Bribery

The prohibition applies whether a bribe is provided or received:

- directly;
- indirectly;

- through an agent;
- through an intermediary;
- through a consultant;
- through another company;
- through a family member;
- through another third party.

5.4 Non-Cash Advantages

A bribe does not have to consist of money.

An improper advantage may potentially include:

- gifts;
- hospitality;
- travel;
- accommodation;
- discounts;
- employment opportunities;
- internships;
- contracts;
- favourable treatment;
- confidential information;
- donations;
- sponsorship;
- services;
- personal benefits;
- other advantages of value.

The circumstances and intention surrounding the advantage shall be considered.

---

6. Definitions

For the purposes of this Policy:

6.1 Bribery

Bribery means offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage in circumstances where doing so is intended to induce, reward or otherwise involve improper performance of a relevant function or activity, or otherwise constitutes bribery under applicable law.

6.2 Corruption

Corruption means dishonest or improper abuse of entrusted power, position, authority or influence for private, organisational or third-party benefit.

6.3 Bribe

A **Bribe** means a financial or other advantage offered, promised, given, requested or accepted in circumstances capable of constituting bribery.

6.4 Associated Person

An **Associated Person** means a person who performs services for or on behalf of the Company within the meaning applicable under relevant legislation.

Whether a person is an associated person depends upon the circumstances and substance of the relationship.

6.5 Public Official

For the purposes of this Policy, **Public Official** includes, where applicable:

- domestic public officials;
- foreign public officials;
- persons holding legislative, administrative or judicial positions;
- persons exercising public functions;
- officials or agents of public international organisations;
- other persons treated as public officials under applicable law.

6.6 Facilitation Payment

A **Facilitation Payment** is generally a payment or advantage intended to secure or accelerate the performance of a routine action by an official or other person where the payer is already entitled to the relevant action.

6.7 Kickback

A **Kickback** is an improper payment, benefit or return of value provided in exchange for favourable treatment, an award of business or another improper advantage.

6.8 Third Party

A **Third Party** means an individual or organisation with whom the Company interacts or conducts activities, including suppliers, contractors, agents, consultants, partners and service providers.

---

7. Bribery

7.1 Offering or Giving Bribes

No person acting for or on behalf of the Company shall offer, promise or give a financial or other advantage where doing so constitutes bribery.

7.2 Receiving Bribes

No person acting for or on behalf of the Company shall request, agree to receive or accept an advantage where doing so constitutes bribery.

7.3 Examples of Prohibited Conduct

Prohibited conduct may include:

- paying an individual to influence a procurement decision improperly;
- offering a personal benefit in exchange for confidential information;
- providing an improper payment to obtain a contract;
- accepting money in exchange for preferential treatment;
- providing an advantage to manipulate an academic or professional decision;
- offering benefits to influence selection, assessment or accreditation improperly;
- disguising an improper payment as a legitimate expense;
- using an intermediary to make a payment that the Company could not lawfully make directly.

7.4 Intent and Circumstances

Whether conduct constitutes bribery depends upon the relevant facts and applicable law.

Individuals shall therefore consider not only the value of a benefit but also:

- its purpose;

- timing;
- recipient;
- relationship between the parties;
- transparency;
- surrounding circumstances;
- expected or requested return benefit.

---

8. Corruption

8.1 Prohibition

Corrupt conduct is prohibited in connection with Company activities.

8.2 Examples

Corrupt conduct may include:

- abuse of authority for personal benefit;
- manipulation of procurement;
- improper influence over appointments or selection;
- undisclosed personal financial interests;
- diversion of Company resources;
- falsification of records to conceal improper benefits;
- collusion with third parties;
- misuse of confidential information;
- deliberate circumvention of financial controls.

8.3 Ethical Conduct

Individuals acting for or on behalf of the Company shall conduct Company activities objectively, honestly and in the legitimate interests of the organisation.

---

9. Associated Persons

9.1 General Principle

The Company recognises that bribery risks may arise through persons performing services for or on its behalf.

The Company shall therefore take a proportionate, risk-based approach to relationships with associated persons.

9.2 Relevant Persons

Depending upon the circumstances, associated persons may include:

- employees;
- agents;
- consultants;
- contractors;
- intermediaries;
- representatives;
- subsidiaries or other entities where legally relevant;
- other persons providing services for or on behalf of the Company.

9.3 Expectations

Associated persons shall be expected to:

- act honestly;
- comply with applicable anti-bribery law;
- avoid improper payments;
- disclose relevant conflicts of interest;
- cooperate with proportionate due diligence;
- maintain appropriate records;
- report suspected bribery where appropriate.

---

10. Responsibilities

10.1 Director

The Director has overall responsibility for oversight of this Policy and the Company's anti-bribery and anti-corruption framework.

The Director shall, where appropriate:

- approve this Policy;
- demonstrate commitment to preventing bribery;

- oversee material bribery risks;
- support appropriate controls;
- review significant allegations;
- ensure appropriate corrective action;
- support periodic review.

10.2 Employees and Associated Persons

Individuals covered by this Policy are responsible for:

- understanding relevant requirements;
- avoiding bribery and corrupt conduct;
- exercising appropriate judgement;
- complying with relevant controls;
- maintaining accurate records;
- reporting suspected breaches;
- cooperating with investigations.

10.3 Managers and Persons with Supervisory Responsibility

Where applicable, persons with management or supervisory responsibilities shall:

- promote compliance;
- identify relevant risks;
- respond appropriately to concerns;
- avoid encouraging conduct inconsistent with this Policy;
- support appropriate due diligence and controls.

---

11. Top-Level Commitment

11.1 Leadership

The leadership of Surkovsky Centre Ltd is committed to conducting Company activities without bribery or corruption.

11.2 Organisational Culture

The Company shall seek to maintain a culture in which:

- bribery is unacceptable;
- ethical conduct is expected;
- concerns can be raised;
- commercial success does not justify unlawful conduct;
- integrity forms part of decision-making.

11.3 Communication

The Company's anti-bribery expectations shall be communicated appropriately to individuals and third parties according to the nature and level of risk associated with their role or relationship.

---

12. Bribery and Corruption Risk Assessment

12.1 Risk-Based Approach

The Company shall assess bribery and corruption risks on a proportionate basis.

The nature and extent of assessment shall reflect the size, structure, activities and risk profile of the Company.

12.2 Risk Factors

Relevant risk factors may include:

- geographic location;
- sector;
- nature of transactions;
- value of contracts;
- use of intermediaries;
- interaction with public officials;
- procurement;
- international activities;
- sponsorship;
- donations;
- gifts and hospitality;
- complex payment arrangements;
- unusual commissions;

- high-risk third parties.

12.3 Periodic Review

Risk assessments shall be reviewed where appropriate, particularly following:

- material changes in Company activities;
- entry into new markets;
- significant new partnerships;
- identified incidents;
- changes in relevant legislation;
- significant changes in risk exposure.

---

13. Due Diligence

13.1 General Principle

The Company shall conduct proportionate due diligence where relationships or activities present material bribery or corruption risks.

13.2 Third-Party Due Diligence

Due diligence may include consideration of:

- identity;
- ownership;
- business reputation;
- relevant experience;
- role and necessity;
- relationship with public officials;
- conflicts of interest;
- payment arrangements;
- geographic risk;
- adverse information;
- anti-bribery controls.

13.3 Risk-Based Depth

Due diligence shall be proportionate to the identified risk.

Higher-risk relationships may require enhanced assessment before appointment or engagement.

13.4 Warning Signs

Potential warning signs may include:

- unexplained requests for cash;
- unusually high commissions;
- payments to unrelated third parties;
- payments to unusual jurisdictions;
- refusal to disclose ownership;
- refusal to agree to anti-bribery provisions;
- close undisclosed relationships with decision-makers;
- requests for inaccurate invoices;
- unusual urgency surrounding payments;
- vague descriptions of services.

Such warning signs shall be considered and, where appropriate, investigated before proceeding.

---

14. Gifts, Hospitality and Entertainment

14.1 General Principle

Reasonable and proportionate gifts, hospitality or entertainment may be legitimate in ordinary professional and business relationships.

They shall never be used to obtain or reward improper advantage.

14.2 Acceptable Hospitality

Hospitality should be:

- reasonable;
- proportionate;
- transparent;
- provided for a legitimate purpose;
- appropriate to the relationship;
- lawful;

- not intended to influence a decision improperly.

14.3 Unacceptable Gifts or Hospitality

Gifts or hospitality shall not be offered or accepted where they:

- are intended to influence improper performance;
- create an improper obligation;
- are excessive or extravagant in the circumstances;
- are concealed;
- involve unlawful activity;
- are provided in exchange for favourable treatment;
- would reasonably create an appearance of corruption.

14.4 Timing

Particular care shall be exercised where gifts or hospitality are offered or received during:

- procurement;
- contract negotiations;
- tender processes;
- recruitment;
- selection processes;
- grant decisions;
- assessments;
- other sensitive decision-making periods.

14.5 Cash Gifts

Cash or cash-equivalent gifts shall not normally be offered or accepted.

Any exceptional situation shall require careful consideration and appropriate authorisation and must remain lawful.

---

15. Facilitation Payments

15.1 Prohibition

Surkovsky Centre Ltd does not permit facilitation payments where they constitute unlawful payments.

Individuals acting for or on behalf of the Company shall not make facilitation payments merely because such payments are customary or routinely requested in a particular jurisdiction.

15.2 Requests

Where a facilitation payment is requested, the individual should, where reasonably possible:

- refuse the request;
- ask for the legal basis of the payment;
- request an official receipt;
- seek appropriate guidance;
- report the request to the Company.

15.3 Personal Safety

Where an individual reasonably believes that refusal of a payment would create an immediate threat to personal safety, protection of life and physical safety takes priority.

Any payment made in such exceptional circumstances shall be reported to the Company as soon as reasonably practicable and accurately recorded.

---

16. Kickbacks and Secret Commissions

16.1 Prohibition

Kickbacks, secret commissions and comparable improper payments are prohibited.

16.2 Examples

Prohibited arrangements may include:

- returning part of a contract payment privately to a decision-maker;
- receiving an undisclosed commission for awarding business;
- paying an intermediary to influence a decision improperly;
- disguising an improper commission as consultancy fees;
- providing personal benefits in exchange for procurement decisions.

16.3 Transparency

Commissions and fees paid by the Company shall have a legitimate purpose, be proportionate to genuine services and be accurately documented.

---

17. Charitable Donations

17.1 Legitimate Donations

The Company may support legitimate charitable activities where consistent with its objectives and applicable law.

17.2 Anti-Bribery Controls

Charitable donations shall not be used:

- as a disguised bribe;
- to obtain improper business advantage;
- to influence a decision improperly;
- to transfer value indirectly to a decision-maker.

17.3 Due Diligence

Where appropriate, the Company shall verify:

- the identity of the recipient;
- the legitimate charitable purpose;
- the intended use of funds;
- relevant relationships with decision-makers.

---

18. Political Contributions

18.1 General Principle

Company resources shall not be used for political contributions unless such activity is lawful, appropriately authorised and consistent with Company policy.

18.2 No Improper Influence

Political contributions shall never be used to:

- obtain improper advantage;
- influence a public decision unlawfully;
- conceal a bribe;

- circumvent restrictions applying to gifts or payments.

18.3 Personal Political Activity

Nothing in this Policy is intended to prevent lawful personal political activity undertaken by individuals in their private capacity.

Personal political activity shall not be represented as being undertaken on behalf of Surkovsky Centre Ltd unless expressly authorised.

---

19. Sponsorship

19.1 General Principle

Surkovsky Centre Ltd may provide or receive sponsorship in connection with legitimate educational, research, professional, publishing, conference or other organisational activities.

Sponsorship arrangements shall be transparent, lawful and consistent with the Company's objectives.

19.2 Prohibition on Improper Sponsorship

Sponsorship shall not be offered, provided, requested or accepted where its purpose is to:

- influence a decision improperly;
- obtain an improper business advantage;
- reward improper conduct;
- conceal a bribe;
- circumvent restrictions concerning gifts, hospitality or payments;
- create an undisclosed personal benefit for a decision-maker.

19.3 Sponsorship Assessment

Where appropriate, sponsorship arrangements shall be assessed with regard to:

- the identity of the sponsor or recipient;
- the purpose of the sponsorship;
- the value of the sponsorship;
- the relationship between the parties;
- any connection with relevant decision-makers;
- reputational considerations;

- potential conflicts of interest;
- applicable contractual conditions.

Material sponsorship arrangements should be appropriately documented.

---

20. Public Officials

20.1 Enhanced Risk

Interactions with public officials may present increased bribery and corruption risks and shall therefore be approached with particular care.

20.2 Prohibition

No person acting for or on behalf of the Company shall offer, promise or give a financial or other advantage to a foreign public official or other public official where doing so would constitute an offence under applicable law.

20.3 Relevant Interactions

Interactions with public officials may arise in connection with:

- licences;
- permits;
- regulatory matters;
- public procurement;
- educational cooperation;
- research cooperation;
- conferences;
- visas and immigration matters;
- customs;
- taxation;
- inspections;
- grants;
- publicly funded projects;
- other governmental or administrative processes.

20.4 Gifts and Hospitality

Particular caution shall be exercised before offering gifts, hospitality, travel, accommodation or other benefits to public officials.

Individuals shall consider:

- applicable law;
- applicable rules governing the official;
- the purpose of the benefit;
- its value;
- timing;
- transparency;
- whether approval is required;
- whether the benefit could reasonably appear intended to influence an official decision.

20.5 Payments

Payments to public bodies or officials shall be made only for legitimate purposes and through appropriate official channels.

Where reasonably practicable, official fees should be supported by appropriate documentation or receipts.

---

21. Conflicts of Interest

21.1 General Principle

Actual, potential or perceived conflicts of interest may increase bribery and corruption risks.

Individuals acting for or on behalf of the Company shall seek to avoid situations in which personal interests improperly influence Company decisions.

21.2 Examples

Conflicts may arise from:

- financial interests;
- family relationships;
- close personal relationships;
- outside employment;
- ownership interests;
- consultancy arrangements;

- gifts or benefits;
- relationships with suppliers;
- relationships with applicants or candidates;
- relationships with research or educational partners.

21.3 Disclosure

Relevant conflicts of interest shall be disclosed to the Company as soon as reasonably practicable.

Disclosure does not necessarily mean that an activity is prohibited.

The purpose of disclosure is to enable the Company to assess and appropriately manage the conflict.

21.4 Management of Conflicts

Appropriate measures may include:

- recording the conflict;
- independent review;
- removal from a decision-making process;
- reassignment of responsibility;
- additional approval;
- termination or modification of the relevant arrangement.

---

22. Third Parties, Agents and Intermediaries

22.1 General Principle

The Company shall not use third parties to perform activities that would be unlawful or prohibited if performed directly by the Company.

22.2 Selection

Agents, consultants, intermediaries and other relevant third parties should be selected on legitimate commercial, professional or organisational grounds.

22.3 Due Diligence

The level of due diligence shall reflect the bribery and corruption risk associated with the relationship.

Higher-risk relationships may require consideration of:

- ownership;
- reputation;
- qualifications;
- experience;
- references;
- relationships with public officials;
- geographic risk;
- expected services;
- proposed compensation;
- payment arrangements;
- conflicts of interest;
- anti-bribery history.

22.4 Contractual Arrangements

Where appropriate, contracts with higher-risk third parties may include provisions requiring:

- compliance with applicable anti-bribery law;
- prohibition of improper payments;
- accurate record keeping;
- cooperation with reasonable compliance enquiries;
- disclosure of relevant conflicts;
- termination rights in the event of serious misconduct.

22.5 Payments to Third Parties

Payments shall correspond to legitimate goods or services and should be proportionate to the value of those goods or services.

Unusual payment requests shall be examined carefully.

Examples include requests for:

- payment in cash;

- payment to an unrelated person;
- payment to an unexplained foreign account;
- split payments without legitimate reason;
- materially inflated commissions;
- false descriptions on invoices.

---

23. Procurement and Supplier Relationships

23.1 Fair Procurement

Procurement decisions shall be made honestly and on legitimate organisational grounds.

Relevant considerations may include:

- quality;
- price;
- competence;
- reliability;
- experience;
- service requirements;
- compliance;
- value for money;
- legitimate operational considerations.

23.2 Improper Influence

No person shall accept an improper benefit in exchange for:

- selecting a supplier;
- influencing a tender;
- modifying procurement requirements;
- providing confidential procurement information;
- approving an invoice;
- renewing a contract;
- providing preferential treatment.

23.3 Supplier Gifts

Gifts or hospitality offered by suppliers or prospective suppliers shall be considered particularly carefully during procurement or contract negotiations.

Benefits that could reasonably compromise, or appear to compromise, impartial decision-making shall not be accepted.

23.4 Supplier Integrity

Where proportionate to the risk, the Company may consider the anti-bribery and ethical standards of significant suppliers and contractors.

---

24. Educational, Research and Professional Activities

24.1 General Principle

Anti-bribery and anti-corruption principles apply fully to the Company's educational, research, academic and professional activities.

24.2 Educational Decisions

No financial or other advantage shall be offered, requested or accepted for the purpose of improperly influencing:

- admission;
- assessment;
- certification;
- academic results;
- selection;
- appointment;
- educational opportunities;
- other academic or educational decisions.

24.3 Research Activities

Research-related decisions shall be made honestly and transparently.

Improper benefits shall not be used to influence:

- research findings;
- research evaluation;

- publication decisions;
- authorship;
- peer review;
- funding decisions;
- access to research opportunities;
- presentation of research results.

24.4 Conferences and Professional Events

Reasonable hospitality associated with conferences, seminars, workshops and professional meetings may be legitimate.

The nature, value and purpose of hospitality shall remain proportionate to the legitimate professional activity.

24.5 Publications

Payments relating to publications, editorial services, research dissemination or other publishing activities shall have a legitimate and transparent purpose.

No payment or benefit shall be used to conceal improper influence over editorial, academic or professional decisions.

---

25. International Activities

25.1 General Principle

Surkovsky Centre Ltd may undertake activities or establish relationships outside the United Kingdom.

International activity may create different bribery and corruption risks depending upon the jurisdiction, sector and nature of the relationship.

25.2 Local Practices

The fact that a payment, gift or other practice is regarded as customary in a particular jurisdiction does not make it acceptable under this Policy.

Individuals shall comply with applicable law and the standards established by the Company.

25.3 International Risk Assessment

Where appropriate, international activities shall be assessed with regard to:

- local bribery and corruption risk;
- public-sector interaction;
- use of agents or intermediaries;
- payment arrangements;
- local regulatory requirements;
- contractual relationships;
- political and economic circumstances;
- transparency of the proposed activity.

25.4 Applicable Laws

Conduct outside the United Kingdom may be subject to:

- UK anti-bribery legislation;
- local anti-corruption legislation;
- contractual requirements;
- other applicable international or domestic legal requirements.

---

26. Financial Controls and Record Keeping

26.1 Accurate Records

The Company shall maintain appropriate financial and business records that accurately reflect legitimate transactions.

26.2 Prohibition on False Records

No person shall knowingly:

- create false invoices;
- create fictitious expenses;
- conceal improper payments;
- misdescribe transactions;
- maintain undisclosed accounts for improper purposes;
- falsify supporting documents;
- approve payments known to be improperly documented.

26.3 Expenses

Expense claims shall accurately describe:

- the nature of the expenditure;
- the amount;
- the legitimate business or organisational purpose;
- supporting evidence where required.

26.4 Payments

Payments should, where appropriate:

- be made to the legitimate contractual party;
- correspond to genuine goods or services;
- be properly authorised;
- be appropriately documented;
- be recorded accurately.

26.5 Record Retention

Records relevant to anti-bribery compliance shall be retained in accordance with applicable legal requirements and the Company's records management and retention arrangements.

---

27. Reporting Concerns

27.1 Duty to Raise Concerns

Individuals covered by this Policy are encouraged to raise concerns where they reasonably suspect:

- bribery;
- attempted bribery;
- corruption;
- facilitation payments;
- kickbacks;
- falsification of records;
- undisclosed conflicts of interest;
- suspicious third-party payments;

- other conduct inconsistent with this Policy.

27.2 Early Reporting

Concerns should be raised as early as reasonably practicable.

Individuals are not expected to prove that bribery or corruption has occurred before raising a genuine concern.

27.3 Reporting Channels

Concerns may be reported to:

- the Director;
- another authorised person where designated;
- an appropriate reporting channel established by the Company.

Where the concern involves the person who would normally receive the report, an alternative appropriate reporting route should be used where available.

27.4 Information to Provide

Where reasonably possible, a report should identify:

- the nature of the concern;
- persons involved;
- relevant dates;
- relevant transactions;
- supporting documents or information;
- any immediate risks.

27.5 Confidentiality

Reports shall be handled with appropriate discretion and confidentiality, subject to:

- fair investigation;
- legal obligations;
- protection of relevant individuals;
- regulatory or law-enforcement requirements.

---

28. Whistleblowing and Protection Against Retaliation

28.1 Good-Faith Reporting

The Company supports the raising of genuine concerns concerning suspected bribery, corruption or related misconduct.

28.2 Protection

No individual should suffer retaliation or detrimental treatment merely because they have raised a genuine concern in good faith or refused to participate in conduct they reasonably believed could constitute bribery or corruption.

28.3 Retaliation

Prohibited retaliation may include:

- threats;
- intimidation;
- harassment;
- improper disciplinary action;
- discrimination;
- deliberate disadvantage;
- other retaliatory conduct.

28.4 Knowingly False Allegations

Protection for genuine reporting does not justify knowingly making false or malicious allegations.

Deliberately false allegations may themselves constitute misconduct.

28.5 Legal Whistleblowing Rights

Nothing in this Policy is intended to restrict any statutory whistleblowing rights or protections available under applicable law.

---

29. Investigation of Suspected Breaches

29.1 Assessment

Reports of suspected bribery or corruption shall be considered appropriately and proportionately.

29.2 Investigation

Where an investigation is appropriate, the Company may:

- preserve relevant records;
- review transactions;
- examine relevant communications;
- interview relevant individuals;
- review contracts and invoices;
- seek professional advice;
- involve external specialists where appropriate.

29.3 Fairness

Investigations shall seek to be:

- objective;
- proportionate;
- appropriately confidential;
- properly documented;
- fair to relevant individuals.

An allegation shall not automatically be treated as proof of misconduct.

29.4 External Reporting

Where appropriate or legally required, suspected criminal conduct may be reported to:

- law-enforcement authorities;
- regulators;
- other competent authorities.

The Company may obtain appropriate legal advice when determining external reporting obligations.

30. Breaches and Disciplinary Action

30.1 Seriousness

Breaches of this Policy may constitute serious misconduct.

30.2 Employees

Where applicable, employee breaches may result in disciplinary action in accordance with relevant employment arrangements and applicable law.

Serious misconduct may result in termination of employment where legally and procedurally appropriate.

30.3 Contractors and Third Parties

Where a contractor, consultant, agent, supplier or other third party breaches relevant anti-bribery obligations, the Company may take appropriate action, including:

- requiring corrective action;
- suspending activities;
- withholding approval of improper payments;
- terminating the relationship where contractually and legally appropriate;
- reporting suspected unlawful conduct.

30.4 Recovery and Remediation

The Company may seek appropriate recovery, remediation or legal remedies where bribery or corruption causes financial, legal or reputational harm.

31. Training and Communication

31.1 Awareness

The Company shall communicate this Policy to relevant individuals in a manner proportionate to their roles and bribery risk exposure.

31.2 Training

Anti-bribery training may be provided where appropriate.

Training may address:

- requirements of this Policy;
- bribery risks;
- gifts and hospitality;
- public officials;

- facilitation payments;
- third-party risks;
- conflicts of interest;
- reporting concerns;
- practical warning signs.

31.3 Risk-Based Training

Individuals working in higher-risk roles or activities may receive more detailed or specific guidance.

31.4 Third-Party Communication

Relevant anti-bribery expectations may be communicated to contractors, agents, consultants, suppliers and other third parties where appropriate.

---

32. Monitoring and Review

32.1 Monitoring

The Company shall monitor the effectiveness of its anti-bribery arrangements on a proportionate and risk-based basis.

Monitoring may include:

- review of reported concerns;
- review of gifts and hospitality;
- review of relevant payments;
- review of third-party relationships;
- examination of identified risk indicators;
- review of due diligence arrangements;
- consideration of incidents and lessons learned.

32.2 Corrective Action

Where weaknesses are identified, the Company shall consider appropriate corrective action.

This may include:

- strengthening controls;
- additional due diligence;

- changing procedures;
- additional training;
- contractual changes;
- increased monitoring;
- termination of inappropriate relationships.

32.3 Regular Review

This Policy shall normally be reviewed at least annually.

The scheduled Review Date is specified in the document control information.

32.4 Additional Review

An additional review may be undertaken following:

- a significant bribery or corruption incident;
- material changes in Company activities;
- entry into higher-risk markets;
- significant new third-party relationships;
- relevant legislative changes;
- changes in regulatory guidance;
- identification of material weaknesses in existing controls.

---

33. Related Company Documents

This Anti-Bribery and Corruption Policy shall be read together with relevant Company documents, including:

- **GOV-001 – Code of Conduct;**
- **GOV-002 – Equality, Diversity & Inclusion;**
- **GOV-003 – Governance Structure;**
- **RES-001 – Research Ethics Policy;**
- **EDU-001 – Academic Integrity Policy;**
- **QA-001 – Quality Assurance Policy;**
- applicable Whistleblowing Policy;
- applicable Conflict of Interest Policy;

- applicable Financial Controls and Expenses procedures;
- applicable Procurement procedures;
- applicable Risk Management Policy;
- other relevant Company policies and procedures.

Where another Company document establishes more specific anti-bribery, financial, procurement or reporting requirements, those requirements shall apply together with this Policy.

---

34. Approval

This Anti-Bribery and Corruption Policy has been approved by the Director of Surkovsky Centre Ltd and shall take effect from the Effective Date specified in this document.

All individuals acting for or on behalf of the Company are expected to comply with the principles, responsibilities and requirements established within this Policy.

The Company is committed to maintaining proportionate procedures designed to prevent bribery and to promoting a culture of integrity, transparency and accountability.

This Policy shall remain subject to periodic review to ensure its continuing effectiveness, legal compliance and alignment with the Company's activities and risk profile.

Document Title: Anti-Bribery and Corruption Policy
Document Number: ABC-001
Company: Surkovsky Centre Ltd
Version: 1.0
Approved by: Board of Directors
Authorised by: Director
Surkovsky Centre Ltd

Signature:

Name: Jozef SURKOVSKY

Date: 1 August 2026

Document History

Version	Date	Description	Approved By
1.0	1 August 2026	Initial issue	Director

End of Document