POLICY

Anti-Bribery and Corruption Policy

Organisation	Asbiverse Limited trading as Intent Institute (part of Asbiverse Group)
Company number	13891216 (registered in England and Wales)
Registered office	Dairy House, Money Row Green, Holyport, Maidenhead, Berkshire, SL6 2ND
Document reference	II-ABC-001
Version	1.0
Issue date	November 2026
Next review	November 2027, or sooner if legislation, guidance or contract requirements change
Approved by	Ankur Shiv Bhandari, Director
Policy owner	Ankur Shiv Bhandari, Director
Contact	info@intent.institute

> Intent Institute is the Asbiverse Group division for public bodies and other industries, and a trading name of Asbiverse Limited. **This policy applies to all activity of Asbiverse Limited under all its trading names, including Intent Institute and Asbiverse Group, in the United Kingdom and in every other country where we work.**

1. Policy statement

Asbiverse Limited has zero tolerance of bribery and corruption in any form. We win work on the quality, value and integrity of what we offer, never by offering, paying, requesting or accepting a bribe. This applies wherever we work, whatever the local custom and whoever is asking.

Our directors are committed to this policy and lead by example. No one who works for us will suffer for refusing to pay or accept a bribe, even if refusing means we lose business.

2. Scope

This policy applies to:

- Our directors, employees and temporary staff.
- Associates, consultants, contractors, agents and anyone else who performs services for us or on our behalf, in the United Kingdom or overseas.
- All our work, including bids and tenders, client delivery, purchasing and partnerships, in every country where we operate.

3. Legal framework

This policy is written to comply with the Bribery Act 2010, which applies to our conduct in the United Kingdom and overseas. Under the Act it is an offence to:

- Offer, promise or give a bribe (section 1).
- Request, agree to receive or accept a bribe (section 2).
- Bribe a foreign public official to obtain or keep business (section 6).

A commercial organisation also commits an offence if a person associated with it bribes another person to obtain or keep business for it, unless it has adequate procedures in place to prevent bribery (section 7). This policy and the procedures in it are those adequate procedures.

Individuals convicted of bribery face up to ten years in prison and an unlimited fine. Organisations face unlimited fines. A conviction is also a mandatory ground for exclusion from public contracts under the Procurement Act 2023. We also observe the anti-corruption laws of every country where we work.

4. What bribery means

A bribe is any financial or other advantage offered, promised, given, requested or accepted to make someone perform their role improperly, or as a reward for having done so. It does not have to be money. It can be a gift, hospitality, a job or work placement, a favour, a donation, a discount or anything else of value. It does not matter whether it is given directly or through a third party.

5. What you must not do

- Offer, promise, give, request or accept a bribe.
- Make facilitation payments. These are small unofficial payments to speed up or secure a routine action by an official, such as a visa, licence, permit or customs clearance. They are bribes under UK law, even where they are common locally.
- Offer anything to a public official, including any person involved in a procurement we are bidding for, to influence a decision.
- Use an associate, agent or other third party to do anything this policy prohibits.
- Threaten or retaliate against anyone who refuses to take part in bribery or raises a concern.

The only exception is a payment demanded under threat to your personal safety or liberty. You may pay it to protect yourself, but you must report it to a director as soon as you are safe, and it will be recorded.

6. Gifts and hospitality

Modest, occasional gifts and hospitality can be a normal part of building relationships. They are acceptable only when they are reasonable, proportionate, given openly and not intended or likely to influence a decision.

Situation	Rule
Any gift or hospitality given or received worth more than £25	Record it in the Gifts and Hospitality Register
Worth more than £50, or more than £150 in a year from or to the same person or organisation	Approval from a director in advance, or as soon as possible if offered unexpectedly
Cash or cash equivalents (vouchers, gift cards, loans)	Never given or accepted
Any person involved in a procurement we are bidding for or delivering	Nothing given or accepted beyond light refreshments at a meeting
Public officials anywhere	Nothing beyond light refreshments at a meeting, unless a director has approved it in writing

If you are unsure, ask a director before you accept or offer anything. If a gift cannot be refused without causing offence, accept it on behalf of the company, record it and pass it to a director.

7. Donations and sponsorship

- Asbiverse Limited does not make political donations.
- Charitable donations and sponsorship must be approved by a director, made openly to a genuine organisation, recorded and never linked to winning or keeping business.

8. Associates, agents and partners

We work with associates and partners in the United Kingdom and overseas, including in countries where bribery risk is higher. Before we engage anyone to act for us, and especially anyone who will deal with clients or officials, we will:

- Carry out due diligence proportionate to the risk: who they are, their reputation, their ownership and why we need them.

- Make sure their fees are proportionate to genuine services, paid by bank transfer to an account in their own name in the country where they work, against an invoice.
- Include anti-bribery obligations and a right to end the contract in our written agreement with them.
- Give them a copy of this policy and ask them to confirm they will follow it.

9. Risk assessment, records and training

- **Risk assessment:** We assess our bribery risk at least once a year and before entering a new country, sector or type of partner.
- **Records:** We keep accurate books and records of all payments, invoices, gifts, hospitality and expenses. No payment is made off the books or described as something it is not.
- **Training:** Everyone covered by this policy receives a copy and a short briefing when they join, with a refresher every year.

10. Raising a concern

If you are offered or asked for a bribe, or suspect bribery by anyone connected with our work, report it immediately:

- **First contact:** Ankur Shiv Bhandari, Director, through info@intent.institute or in person.
- **If the concern involves Ankur Shiv Bhandari:** Rishi Bhandari, Director, in person or in writing marked "Confidential".

Concerns can be raised in confidence. Anyone who raises a genuine concern in good faith will be supported and protected from any detriment, in line with the Public Interest Disclosure Act 1998, even if the concern turns out to be mistaken.

11. Breaches

Breach of this policy by an employee will be treated as gross misconduct and may lead to dismissal. Breach by an associate, contractor or partner will lead to the end of our relationship. Where the law requires, or where it is appropriate, we will report the matter to the relevant authorities.

12. Monitoring and review

The policy owner monitors how this policy works in practice, reviews the Gifts and Hospitality Register at least every six months, and reviews the policy every year or sooner if the law or our activities change.

Signed	
Name	Ankur Shiv Bhandari
Position	Director, Asbiverse Limited
Date	