

Anti-bribery and Anticorruption Policy

The Academy is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented in all business dealings and relationships wherever it operates. The Academy has a zero-tolerance approach to bribery and corruption activities.

This Anti-bribery and Anticorruption Policy applies to all Academy personnel at any level, as well as Contractors, Agents and any other persons associated with the Academy (including Third Parties).

Any arrangements the Company makes with a Third Party, is subject to clear Contractual Terms, including specific provisions that require Third Party to comply with minimum standards and procedures relating to anti-bribery and anti-corruption.

The Academy does not accept and will not make any facilitation payments with the purpose of expediting routine governmental actions.

The Academy will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates since such donations may be perceived as an attempt to gain an improper business advantage.

The Academy accepts and encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions– and agrees to disclose all charitable contributions it makes, as long as it ensured that they are not used to facilitate and conceal acts of bribery.

All Academy's Employees are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to or imply a breach of this anti-bribery policy. If any employee has reason to believe or suspect that an instance of bribery or corruption has occurred or is about to occur, he/she should report it at once to the senior management. The Academy reserves the right to terminate a contractual relationship with an employee, if this Policy is breached.