



Anti-Bribery and Corruption Policy

Audax International Ltd

Company	Audax International Ltd
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1. Policy Statement

Audax International Ltd has a zero-tolerance approach to bribery and corruption and is committed to acting with integrity in all business dealings, including the provision of specialist training services to UK and international government clients.

2. Legal Framework

This policy ensures compliance with the UK Bribery Act 2010 and relevant international anti-corruption frameworks.

3. Scope

This policy applies to all employees, directors, consultants, contractors, and third parties acting on behalf of Audax International Ltd.

4. Definition of Bribery

Bribery includes offering, promising, giving, requesting, or accepting any financial or other advantage intended to induce or reward improper performance.

5. Prohibited Conduct

No individual may offer, give, request, or accept bribes, facilitation payments, kickbacks, or improper inducements.

6. Gifts and Hospitality

Gifts and hospitality must be proportionate, transparent, and not influence decision-making.

7. Public Officials

Dealings with public officials must be lawful, documented, and subject to enhanced scrutiny.

8. Third Parties and Due Diligence

Appropriate due diligence will be conducted on consultants, agents, and partners to mitigate corruption risks.

9. Reporting Concerns

All concerns must be reported promptly. Whistleblowers will be protected from retaliation.

10. Responsibilities

Senior management are accountable for implementation. All personnel must comply and complete required training.

11. Monitoring and Review

This policy will be reviewed periodically to ensure effectiveness.

12. UK Bribery Act – Adequate Procedures (Six Principles)

Principle 1 – Proportionate Procedures

Audax International Ltd implements proportionate procedures reflecting the scale, nature, and international footprint of its operations in the criminal justice sector.

Principle 2 – Top-Level Commitment

Senior leadership demonstrates a clear commitment to preventing bribery and promoting an anti-corruption culture across all operations.

Principle 3 – Risk Assessment

The company conducts periodic assessments of bribery and corruption risks, particularly in international and government-facing engagements.

Principle 4 – Due Diligence

Due diligence is undertaken on third parties, including consultants and partners, to ensure integrity and compliance.

Principle 5 – Communication and Training

This policy is communicated to all personnel and supported by training where appropriate to ensure understanding and compliance.

Principle 6 – Monitoring and Review

The company monitors and reviews its anti-bribery controls to ensure they remain effective and up to date.