



ANTI-BRIBERY AND CORRUPTION POLICY

Effective date: 20 February 2026

Last updated: 23 July 2026

1. Policy Statement

Athena GESDA Ltd is committed to conducting business honestly, ethically, transparently and with integrity.

We have a zero-tolerance approach to bribery and corruption in all forms. We will not offer, promise, give, request, agree to receive or accept a bribe, either directly or indirectly.

We will not tolerate bribery or corruption by:

- directors;
- employees;
- consultants;
- contractors;
- agents;
- representatives;
- suppliers;
- delivery partners;
- joint-venture partners;
- institutions;
- intermediaries; or
- any other person performing services for or on behalf of Athena GESDA.

We are committed to complying with the Bribery Act 2010 and all other anti-bribery and anti-corruption laws applicable to the countries in which we operate.

Where local law, custom or business practice is less strict than this Policy, this Policy will apply unless doing so would breach applicable law.

2. About Athena GESDA

Athena GESDA Ltd is a UK-based international education consultancy.

Our activities may include:

- international student recruitment strategy;
- market-entry and internationalisation consultancy;

- university and institutional partnership development;
- international education roadshows;
- school and university engagement;
- conferences, events and delegations;
- leadership immersion programmes;
- training and professional development;
- counsellor engagement and certification;
- university-industry-government collaboration;
- employability and enterprise programmes;
- Global Capability Centre advisory and operational support;
- admissions, conversion and compliance support;
- research and innovation partnerships;
- international mobility programmes; and
- other education-related consultancy and programme-delivery services.

Company name: Athena GESDA Ltd

Company number: 7044526

Registered office: 71 Prospect Street, Nottingham, NG7 5QE, United Kingdom

Website: www.athenagesda.org

Email: info@athenagesda.org

3. Purpose of this Policy

The purpose of this Policy is to:

- set out Athena GESDA's position on bribery and corruption;
- explain the standards expected of everyone working for or with us;
- identify situations that may create bribery or corruption risks;
- establish rules governing gifts, hospitality, expenses and other benefits;
- provide guidance on working with agents, intermediaries and international partners;
- explain how concerns should be reported;

- ensure appropriate records are maintained; and
- support proportionate procedures designed to prevent bribery.

This Policy is intended to protect:

- Athena GESDA;
- its directors and personnel;
- its Clients and Partners;
- the institutions and communities with which it works; and
- the integrity of its business relationships.

4. Scope

This Policy applies to all persons working for or on behalf of Athena GESDA, including:

- directors and officers;
- permanent and temporary employees;
- consultants;
- self-employed contractors;
- secondees;
- interns and volunteers;
- agents and representatives;
- event and roadshow delivery partners;
- recruitment and business-development intermediaries;
- advisers;
- suppliers and subcontractors; and
- any other associated person performing services for or on behalf of Athena GESDA.

All such persons are referred to in this Policy as “Associated Persons”.

Clients, suppliers and institutional Partners are also expected to act consistently with the principles of this Policy when working with Athena GESDA.

5. Legal Framework

The Bribery Act 2010 creates offences relating to:

- offering, promising or giving a bribe;
- requesting, agreeing to receive or accepting a bribe;
- bribing a foreign public official; and
- a commercial organisation failing to prevent bribery by a person associated with it.

Bribery may occur in either the public or private sector and may take place in the United Kingdom or overseas.

A bribe does not have to involve cash. It may involve any financial or other advantage offered or provided to influence a decision or reward improper conduct.

Individuals and organisations may face serious criminal, financial and reputational consequences for involvement in bribery.

Athena GESDA may also be liable for bribery carried out by an Associated Person intending to obtain or retain business or a business advantage for Athena GESDA, even where senior management did not authorise or know about the conduct.

6. What Is Bribery?

Bribery is offering, promising, giving, requesting, agreeing to receive or accepting a financial or other advantage in order to:

- induce someone to perform a function improperly;
- reward someone for improper performance;
- influence a decision improperly;
- obtain or retain business;
- obtain a commercial, regulatory or institutional advantage; or
- influence a foreign public official in their official capacity.

A financial or other advantage may include:

- cash;
- gifts;
- hospitality;

- travel;
- accommodation;
- entertainment;
- employment;
- internships;
- scholarships;
- commissions;
- discounts;
- loans;
- charitable donations;
- sponsorship;
- political contributions;
- confidential information;
- favourable treatment;
- preferential access;
- services provided free of charge;
- personal favours; or
- benefits offered to a relative, friend or connected person.

The advantage does not need to be accepted for an offence or breach of this Policy to arise. Offering or promising an improper advantage may itself be prohibited.

7. What Is Corruption?

Corruption is the misuse of entrusted power, position, influence or authority for private or organisational gain.

It may include:

- bribery;
- fraud;
- extortion;

- embezzlement;
- secret commissions;
- abuse of office;
- conflicts of interest;
- nepotism;
- favouritism;
- manipulation of procurement;
- improper influence over admissions or recruitment;
- diversion of funds;
- falsification of records; or
- collusion with suppliers or officials.

Corruption may involve individuals, private companies, educational institutions, public authorities or government officials.

8. Prohibited Conduct

Associated Persons must not:

- offer, promise or give a bribe;
- request, agree to receive or accept a bribe;
- provide an improper payment through an agent or other intermediary;
- make a facilitation payment;
- provide an undisclosed commission or kickback;
- offer employment, internships or opportunities to improperly influence a decision;
- misuse charitable donations or sponsorship;
- offer excessive or inappropriate gifts or hospitality;
- falsify expenses, invoices or accounting records;
- conceal the true purpose of a payment;
- use personal funds to do something prohibited on behalf of Athena GESDA;

- retaliate against a person who reports a concern in good faith;
- ignore clear warning signs of bribery;
- encourage another person to breach this Policy; or
- assist in concealing bribery or corrupt conduct.

An Associated Person who is uncertain whether proposed conduct is permitted must obtain approval before proceeding.

9. Examples Relevant to Athena GESDA

The following conduct would be prohibited:

- offering money or a gift to a university employee to award Athena GESDA a contract;
- paying a school representative personally in return for access to students;
- offering travel or luxury hospitality to influence a procurement decision;
- paying an admissions employee to accelerate or approve an application;
- providing an undisclosed personal commission to a university representative;
- paying a government official to issue a licence, visa or approval improperly;
- arranging an internship for an official's relative in exchange for favourable treatment;
- disguising an improper payment as consultancy, marketing or event expenditure;
- allowing an agent to use part of their commission to influence an institutional decision;
- accepting money from a supplier in return for selecting that supplier;
- providing a scholarship or fee waiver primarily to influence a decision-maker;
- offering personal gifts to secure participation in a roadshow;
- submitting false receipts or inflated supplier invoices;
- making a donation to an organisation selected by a decision-maker to influence a contract; or
- paying an unofficial fee to avoid ordinary administrative procedures.

10. Facilitation Payments

Athena GESDA prohibits facilitation payments.

A facilitation payment is typically a small, unofficial payment made to secure or accelerate the performance of a routine action by a public official.

Examples may include payments to:

- process a visa;
- release goods;
- schedule an inspection;
- issue a permit;
- connect utilities;
- pass through customs;
- obtain routine administrative documents; or
- accelerate an application.

Facilitation payments are prohibited even where they are described as customary, expected or necessary to get things done.

Legitimate, officially published fees paid directly to a government department or authorised service provider are permitted, provided that:

- the payment is lawful;
- an official receipt is obtained;
- the amount is properly recorded; and
- the payment is not made to an individual personally.

Personal safety exception

Where a payment is demanded under an immediate and credible threat to a person's health, safety or liberty, personal safety must take priority.

Any payment made in such circumstances must be:

- reported to Athena GESDA as soon as safely possible;
- accurately recorded;
- supported by available details; and

- reviewed to determine whether further reporting or action is required.

11. Kickbacks and Secret Commissions

Kickbacks and secret commissions are prohibited.

A kickback involves returning part of a payment, commission or contract value to someone who improperly helped obtain or retain the business.

No Associated Person may:

- receive a personal share of a supplier payment;
- agree to inflated invoices so that excess funds can be returned;
- pay part of a commission to a decision-maker;
- accept personal benefits for recommending a supplier; or
- enter into an undisclosed commission arrangement.

All commissions and referral arrangements must be:

- commercially reasonable;
- documented in writing;
- paid to the proper contracting party;
- supported by genuine services;
- approved by an authorised Athena GESDA representative; and
- recorded accurately.

12. Gifts

Modest business gifts may sometimes be appropriate, but they must never be used to influence a decision improperly.

A gift may be given or accepted only where it is:

- lawful;
- modest and proportionate;
- occasional;
- transparent;
- connected with a legitimate business purpose;

- not cash or a cash equivalent;
- not intended to influence a decision;
- not capable of creating an obligation;
- not offered during a sensitive decision-making process; and
- consistent with the recipient's own rules.

Cash and cash-equivalent gifts are prohibited, including:

- gift cards;
- vouchers readily exchangeable for cash;
- personal loans;
- cryptocurrency;
- shares; and
- direct personal payments.

Approval thresholds

Unless otherwise approved in writing:

- gifts with a value of up to £50 per person may be given or accepted where all other requirements are met;
- gifts exceeding £50 require prior written approval from the Founder and Chief Executive Officer or designated Policy Owner;
- gifts exceeding £100 will normally be declined unless there is a compelling, lawful and culturally appropriate reason; and
- repeated gifts from the same source must be considered cumulatively.

These thresholds do not make a gift automatically acceptable. A low-value gift may still be inappropriate because of its timing, purpose or context.

Gifts given to public officials require particular caution and should not be offered without prior written approval.

13. Hospitality and Entertainment

Reasonable and proportionate hospitality may support legitimate business relationships.

Hospitality may include:

- meals;
- refreshments;
- conference attendance;
- cultural events;
- educational visits;
- receptions; or
- reasonable entertainment connected with a genuine business activity.

Hospitality must not be:

- excessive or lavish;
- frequent enough to create an obligation;
- offered secretly;
- provided in exchange for favourable treatment;
- primarily for personal enjoyment;
- offered during a tender or procurement decision without appropriate approval;
- extended disproportionately to family members or friends; or
- inconsistent with the recipient's policies.

Approval thresholds

Unless otherwise approved:

- ordinary business hospitality up to £100 per person may be provided or accepted where reasonable and appropriate;
- hospitality exceeding £100 per person requires prior written approval;
- hospitality exceeding £250 per person will normally be prohibited unless exceptional circumstances are documented and approved; and
- hospitality involving travel or overnight accommodation always requires prior written approval.

The total value, frequency, timing and purpose must be considered, not merely the cost of an individual occasion.

14. Travel and Accommodation

Athena GESDA may, in legitimate circumstances, pay for or accept reasonable travel or accommodation connected with:

- roadshows;
- institutional visits;
- conferences;
- training;
- due-diligence meetings;
- speaking engagements; or
- programme delivery.

Travel and accommodation must:

- serve a legitimate business purpose;
- be proportionate;
- use reasonable routes and standards;
- be approved in advance;
- be paid directly to the supplier where practicable;
- avoid unnecessary leisure elements;
- not include family members unless separately paid for; and
- be accurately recorded.

Athena GESDA will not normally pay:

- personal holiday expenses;
- upgrades without business justification;
- expenses for spouses or family members;
- cash allowances unsupported by actual costs; or
- extended stays unrelated to the business activity.

Where a trip combines business and personal travel, the personal element must be separately identified and paid by the individual.

15. Gifts and Hospitality Register

Athena GESDA will maintain a Gifts and Hospitality Register appropriate to the size and risk profile of the business.

Associated Persons must record:

- all gifts offered, given, accepted or declined with a value exceeding £50;
- all hospitality exceeding £100 per person;
- all gifts or hospitality involving a public official;
- repeated lower-value benefits from the same source;
- travel or accommodation paid by a third party;
- any offer that appeared unusual or potentially improper; and
- the approval decision.

Records should include:

- date;
- giver and recipient;
- organisation;
- description;
- estimated value;
- business purpose;
- relevant project or decision;
- whether it was accepted or declined; and
- approval obtained.

1. Public Officials

Interactions with public officials may present heightened risk.

A public official may include:

- elected representatives;
- civil servants;
- government employees;

- embassy or consular officials;
- immigration officials;
- regulators;
- employees of state-owned or state-controlled organisations;
- employees of public universities;
- political-party officials;
- candidates for public office;
- judges;
- members of royal households acting officially; and
- persons acting on behalf of public international organisations.

No payment, gift, hospitality or other advantage may be offered to a public official to influence them in their official capacity.

Any gift, hospitality, travel, accommodation, sponsorship or other benefit involving a public official requires prior written approval.

Legitimate official fees must be paid to the relevant authority using approved payment channels and must be supported by official documentation.

16. Political Contributions

Athena GESDA does not make political donations or contributions on behalf of the company unless expressly approved by the Board or directors and permitted by law.

No Associated Person may use Athena GESDA funds, resources, name, facilities or relationships to support:

- a political party;
- a political candidate;
- an election campaign;
- lobbying intended to secure an improper advantage; or
- a political organisation,

without prior written authorisation.

Individuals may participate in lawful political activity in a personal capacity, provided that:

- Athena GESDA is not represented as supporting the activity;
- company resources are not used;
- the activity does not create a conflict of interest; and
- the individual complies with applicable law.

17. Charitable Donations and Community Support

Athena GESDA may support legitimate charitable, educational or community initiatives.

A donation must not be used to:

- influence a business decision;
- reward a public official;
- benefit a decision-maker personally;
- disguise a bribe;
- route funds to an improper recipient; or
- circumvent procurement or approval rules.

Before a material donation is made, Athena GESDA should consider:

- the identity and legitimacy of the recipient;
- the purpose of the donation;
- links to Clients, officials or decision-makers;
- whether the donation was requested during a procurement process;
- how the funds will be used; and
- whether the payment presents a reputational or compliance risk.

Donations must be approved, documented and paid to the recognised organisation rather than to an individual.

18. Sponsorship

Sponsorship arrangements may be used for legitimate brand, educational or community purposes.

Sponsorship must:

- have a clear and genuine purpose;

- provide proportionate and documented benefits;
- be supported by a written agreement;
- be paid to the legitimate organisation;
- be accurately recorded;
- be subject to appropriate due diligence; and
- not be linked to an improper decision or advantage.

Particular caution is required where sponsorship is requested by:

- a public official;
- a university decision-maker;
- a procurement contact;
- an agent involved in contract selection; or
- a person connected to an active tender or negotiation.

19. Scholarships, Bursaries and Educational Benefits

Because Athena GESDA operates in education, scholarships, bursaries, fee reductions, training places and other educational benefits may create particular risks.

Such benefits must be:

- awarded through transparent criteria;
- supported by a legitimate educational purpose;
- properly approved;
- accurately recorded;
- free from improper influence;
- not provided as a personal favour to a decision-maker; and
- not conditional on awarding business to Athena GESDA.

Where a scholarship or educational benefit is provided to a relative or associate of a public official, university representative or Client decision-maker, enhanced review and written approval are required.

20. Agents, Consultants and Intermediaries

Athena GESDA may be responsible for improper payments made by agents, consultants, representatives and other persons performing services on its behalf.

Before appointing a material agent or intermediary, Athena GESDA should undertake proportionate due diligence.

This may include:

- confirming identity and ownership;
- understanding qualifications and experience;
- checking references;
- reviewing reputation and adverse information;
- identifying links to public officials or decision-makers;
- understanding how services will be delivered;
- assessing the proposed commission or Fee;
- confirming bank-account ownership;
- considering the countries and sectors involved;
- reviewing anti-bribery controls; and
- documenting the commercial need for the appointment.

All appointments must be supported by a written agreement that:

- clearly describes the services;
- sets out reasonable compensation;
- prohibits bribery and facilitation payments;
- requires compliance with applicable law;
- provides for accurate records;
- requires disclosure of conflicts;
- permits termination for serious breach; and
- restricts unauthorised subcontracting where appropriate.

Payments must not be made:

- in cash without exceptional written approval;
- to an unrelated third party;
- to an unexplained offshore account;
- without an invoice or supporting evidence;
- before services are performed without a legitimate reason; or
- where the amount is excessive relative to the work.

21. Suppliers and Delivery Partners

Athena GESDA expects suppliers and Partners to comply with applicable anti-bribery laws and to maintain appropriate controls.

Proportionate checks may be undertaken where:

- the relationship is high value;
- services are delivered internationally;
- public officials are involved;
- the supplier will act on Athena GESDA's behalf;
- substantial commissions are payable;
- the proposed arrangement is unusual;
- subcontracting is extensive; or
- other risk factors are present.

Suppliers and Partners must not:

- offer bribes on Athena GESDA's behalf;
- make facilitation payments;
- create false records;
- use improper sub-agents;
- provide secret commissions;
- misrepresent expenditure; or
- conceal conflicts of interest.

22. Conflicts of Interest

A conflict of interest arises where personal, financial or other interests may influence, or appear to influence, professional judgement.

Associated Persons must disclose actual, potential or perceived conflicts, including:

- financial interests in suppliers or Partners;
- family or personal relationships with decision-makers;
- outside employment or consultancy;
- gifts or benefits from a bidder;
- personal involvement in a Client procurement decision;
- ownership of an organisation seeking Athena GESDA business; or
- commissions from more than one party in the same transaction.

A conflict does not necessarily mean wrongdoing has occurred, but it must be disclosed and managed.

Athena GESDA may:

- require withdrawal from a decision;
- appoint an independent reviewer;
- restrict access to information;
- require divestment of an interest;
- disclose the conflict to an affected party; or
- prohibit the arrangement.

23. Procurement and Contracting

Supplier and Partner selection must be based on legitimate factors such as:

- quality;
- expertise;
- suitability;
- reliability;
- price;

- value;
- compliance;
- reputation;
- capacity; and
- service requirements.

Procurement decisions must not be influenced by personal gifts, hospitality, relationships or undisclosed benefits.

Where proportionate:

- competing quotations should be obtained;
- approval responsibilities should be separated;
- material decisions should be documented;
- supplier ownership should be checked;
- unusual pricing should be investigated; and
- invoices should be matched to services delivered.

24. Expenses

All expenses must be:

- genuinely incurred for business purposes;
- reasonable;
- supported by receipts or appropriate evidence;
- accurately described;
- submitted promptly; and
- approved by an authorised person.

Associated Persons must not:

- submit false or duplicate claims;
- inflate expenses;
- disguise gifts or payments as expenses;
- divide expenditure to avoid approval limits;

- claim personal costs as business costs; or
- approve their own unsupported expenditure.

25. Financial Records and Internal Controls

Athena GESDA must maintain accurate books and records that fairly reflect transactions and expenditure.

No person may:

- maintain an undisclosed account;
- create false or misleading entries;
- use vague descriptions to hide a payment;
- backdate an agreement improperly;
- create a false invoice;
- record a bribe as a legitimate expense;
- approve payment without appropriate evidence; or
- destroy records to conceal misconduct.

Payments should be supported, as applicable, by:

- a contract;
- purchase order;
- invoice;
- receipt;
- approval record;
- explanation of services;
- evidence of delivery; and
- appropriate due diligence.

Records relating to anti-bribery approvals and transactions should normally be retained for at least seven years, unless a different legal or contractual period applies.

26. Risk Assessment

Athena GESDA will assess bribery and corruption risks proportionately, taking account of:

- countries of operation;
- public-sector involvement;
- reliance on agents and intermediaries;
- use of commissions;
- procurement activity;
- event and hospitality expenditure;
- major partnerships;
- government approvals;
- travel and visa processes;
- education admissions and recruitment activities;
- the value and complexity of transactions; and
- known concerns or warning signs.

Risk assessments should be reviewed when:

- entering a new country;
- introducing a new Service;
- appointing a material agent;
- entering a joint venture;
- bidding for a significant contract;
- working closely with public officials;
- receiving a report of misconduct; or
- the risk environment materially changes.

27. Warning Signs

Warning signs may include:

- a request for payment in cash;
- an unusually high commission;
- vague or undefined services;
- a request to pay an unrelated third party;

- a request to use an offshore account without explanation;
- refusal to sign an anti-bribery clause;
- close personal links to an official or decision-maker;
- lack of relevant experience;
- a claim of special influence or access;
- a request for payment before approval is obtained;
- false or incomplete invoices;
- resistance to due diligence;
- unusual urgency or secrecy;
- a request for a charitable contribution linked to a decision;
- an insistence that a particular intermediary be used;
- hospitality that appears disproportionate;
- a request to misdescribe a payment;
- unexplained subcontractors;
- payment for apparently unnecessary consultancy;
- a demand for an unofficial fee; or
- a statement that bribery is simply how business is done locally.

Warning signs must be reported and investigated before proceeding.

28. Training and Communication

Athena GESDA will communicate this Policy to relevant Associated Persons.

Proportionate training or briefing may be provided to persons involved in:

- international business development;
- institutional partnerships;
- procurement;
- payments;
- event delivery;
- agent management;

- public-sector engagement;
- recruitment;
- finance; and
- higher-risk markets.

Training may cover:

- the Bribery Act 2010;
- prohibited conduct;
- gifts and hospitality;
- facilitation payments;
- warning signs;
- reporting procedures;
- record keeping; and
- practical scenarios relevant to Athena GESDA.

Suppliers, agents and Partners may be required to confirm that they have read and will comply with this Policy or equivalent standards.

29. Responsibilities

29.1. Founder and Chief Executive Officer

The Founder and Chief Executive Officer has overall responsibility for:

- approving this Policy;
- promoting ethical leadership;
- assessing material risks;
- approving higher-risk arrangements;
- reviewing serious concerns;
- ensuring proportionate controls are implemented; and
- monitoring the effectiveness of the Policy.

29.2. Managers and project leads

Persons managing projects, suppliers, agents or Partners must:

- communicate expected standards;
- identify risks;
- ensure appropriate due diligence;
- obtain required approvals;
- monitor expenditure;
- respond to warning signs; and
- escalate concerns.

29.3. All Associated Persons

Everyone within scope must:

- read and comply with this Policy;
- avoid prohibited conduct;
- complete required training;
- disclose conflicts;
- maintain accurate records;
- seek guidance where uncertain; and
- report suspected misconduct promptly.

30. Seeking Guidance

Associated Persons should seek advice before proceeding where:

- the purpose of a payment is unclear;
- a public official is involved;
- a proposed gift or hospitality exceeds the stated threshold;
- a request appears unusual;
- a commission seems excessive;
- a payment is requested to an unrelated person or account;
- there is pressure to act quickly or secretly;
- the arrangement is not documented;
- a conflict of interest exists; or

- they are unsure whether conduct is permitted.

Questions should be directed to:

Email: info@athenagesda.org

No person will be criticised for delaying a transaction in good faith while seeking compliance guidance.

31. Reporting Concerns

Any suspected bribery, attempted bribery, corruption, fraud, conflict of interest or breach of this Policy must be reported promptly.

Reports may be made to:

Founder and Chief Executive Officer

Email: info@athenagesda.org

A report should include, where possible:

- what happened;
- when and where it happened;
- who was involved;
- the relevant Client, supplier or project;
- the amount or benefit concerned;
- supporting documents; and
- whether anyone may be at immediate risk.

Concerns may be raised confidentially.

Associated Persons should not investigate serious concerns independently or confront suspected individuals where doing so could compromise evidence or safety.

32. Protection from Retaliation

Athena GESDA will not tolerate retaliation against anyone who:

- refuses to participate in bribery;
- declines to make a facilitation payment;
- reports a genuine concern;
- assists an investigation; or

- seeks guidance in good faith.

Retaliation may include:

- dismissal;
- loss of work;
- intimidation;
- threats;
- discrimination;
- harassment;
- adverse treatment; or
- exclusion from opportunities.

Anyone who believes they have experienced retaliation should report it immediately.

A person who deliberately makes a false or malicious allegation may be subject to appropriate action. An allegation that is made honestly but is not substantiated will not be treated as malicious.

33. Investigation and Response

Athena GESDA will assess reports promptly and proportionately.

This may involve:

- preserving documents and payment records;
- reviewing contracts and communications;
- interviewing relevant persons;
- suspending a transaction;
- pausing payments;
- obtaining legal advice;
- appointing an independent investigator;
- conducting enhanced due diligence;
- notifying insurers;
- reporting the matter to law-enforcement or regulatory authorities; or

- taking disciplinary or contractual action.

Investigations will be handled as confidentially as reasonably possible.

No individual is guaranteed complete anonymity where disclosure is required to investigate, protect others or comply with law.

34. Breaches of this Policy

A breach of this Policy may result in:

- disciplinary action;
- termination of employment or engagement;
- withholding or recovery of payments;
- termination of a supplier or Partner relationship;
- removal from a project;
- civil proceedings;
- referral to law-enforcement authorities; or
- other appropriate action.

A failure to report known or reasonably suspected bribery may itself be treated as a serious breach.

Contracts with agents, consultants, suppliers and Partners may be terminated immediately where serious bribery or corruption concerns arise.

35. Monitoring and Review

Athena GESDA will monitor the effectiveness of this Policy proportionately.

Monitoring may include:

- reviewing the Gifts and Hospitality Register;
- reviewing higher-risk payments;
- checking agent and supplier due diligence;
- reviewing expense claims;
- monitoring commission arrangements;
- considering concerns and investigations;
- assessing training completion;

- reviewing contractual controls; and
- updating risk assessments.

This Policy will be reviewed at least annually and sooner where:

- law or regulatory guidance changes;
- Athena GESDA enters a new market;
- the business model materially changes;
- a significant concern is reported;
- new risk areas are identified; or
- monitoring indicates that controls should be strengthened.

38. Approval

This Policy has been approved by the leadership of Athena GESDA Ltd.

Name: Andreea Willmott

Position: Founder and Chief Executive Officer

For and on behalf of: Athena GESDA Ltd

Date: 27 July 2026

39. Contact

Questions, approval requests and concerns relating to this Policy should be sent to:

Athena GESDA Ltd

Email: info@athenagesda.org

Website: www.athenagesda.org

Document Control

Document title: Anti-Bribery and Corruption Policy

Document owner: Athena GESDA Ltd

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Applicable jurisdiction: United Kingdom