



Quality Plus Consultants

Policy Name:	Anti-Corruption and Bribery Policy		
Revision	Authorisation	Approval Date	Effective Date
0		April 15 th 2025	April 15 th 2025
Last Date Reviewed			Next Review Date
April 15 th 2025			April 15 th 2028

1. Introduction

Quality Plus Consultants (QPC) is unwavering in its commitment to conducting business with the utmost integrity, transparency, and accountability. This Anti-Corruption and Bribery Policy delineates our zero-tolerance stance on bribery and corruption, ensuring strict adherence to the laws of Trinidad and Tobago, including the **Prevention of Corruption Act Chapter 11:11**.

2. Purpose

The objectives of this policy are to:

- Establish definitive guidelines to prevent bribery and corruption in all QPC operations.
- Ensure unwavering compliance with applicable local laws and regulations.
- Promote and uphold ethical business practices among consultants, contractors, and third parties associated with QPC.

3. Scope

This policy is applicable to all QPC directors, officers, agents, contractors, consultants, and any other third-party representatives engaged in business with QPC.

4. Definitions

- **Bribery:** The act of offering, giving, receiving, or soliciting anything of value to influence the actions of an individual in a position of trust.
- **Corruption:** Dishonest or fraudulent conduct by those in power, typically involving bribery.

5. Policy Statements

- **Prohibition of Bribery and Corruption:** QPC strictly prohibits all forms of bribery and corruption, whether direct or indirect, in all business dealings.



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- **Gifts and Hospitality:** QPC directors, officers, agents, contractors, consultants, and any other third-party representatives engaged in business with QPC must not offer or accept gifts or hospitality that could be perceived as an attempt to influence business decisions. *Note: This does not apply to tokens and gifts given at tradeshow and meals and refreshments provided while at work.*
- **Facilitation Payments:** QPC does not permit facilitation payments, which are unofficial payments made to expedite routine governmental actions.
- **Charitable Contributions:** All charitable donations must be transparent, legal, and not used as a subterfuge for bribery.

6. Responsibilities

QPC Managing Director is responsible for implementing and enforcing this policy, providing training, and ensuring compliance.

7. Reporting and Whistleblowing

QPC undertakes to receive all reports and any concerns regarding bribery or corruption and treat same with urgency. Reports can be made confidentially and without fear of retaliation.

8. Record-Keeping

Accurate and transparent records of all transactions must be maintained to demonstrate compliance with this policy and relevant laws.

9. Training and Communication

QPC directors, officers, agents, contractors and consultants will engage in regular training to ensure understanding and compliance with anti-corruption laws and this policy.

10. Monitoring and Review

QPC will conduct periodic review to assess the effectiveness of this policy and make necessary adjustments to enhance its efficacy.

11. Consequences of Non-Compliance

Breaches of this policy may result in the termination of contractual agreements and potential legal consequences under Trinidad and Tobago law.

12. Review and Amendments

This policy will be reviewed every three (3) years or as required due to changes in laws, regulations, or company policies.