# Anti-Bribery and Anti-Corruption Policy 2026

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| **Approved by:** | Alison Colwell, Principal | **Last reviewed on:** | September 2026 |
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*This policy applies to Baleares International College at both sites, Sa Porrassa and Sant Agustí.*

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## Purpose

As part of the Ariston Education group, **Baleares International College** is committed to conducting business in an ethical and honest manner, and to implementing and enforcing systems that ensure bribery is prevented. Ariston Education has zero-tolerance for bribery and corrupt activities, and is committed to acting professionally, fairly, and with integrity in all business dealings and relationships, in whichever country they operate.

This policy sets out the responsibilities of Baleares International College and those who work within the school with regard to observing and upholding a zero-tolerance position on bribery and corruption. It also acts as a source of information and guidance to help staff recognise and deal with bribery and corruption issues.

## Scope

This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with **Baleares International College,** including third parties, their subsidiaries or their employees, no matter where they are located (within or outside Spain or the UK). The policy also applies to all administrators (administradores) of the company, members of any Ariston Education board or committee.

In the context of this policy, third-party refers to any individual or organisation that **Baleares International College** and its staff meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, as well as government and public bodies, including their advisors, representatives and officials, politicians and public parties.

Any arrangements Baleares International College makes with a third party are subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

## Legislation and Guidance

The Ariston Education group applies the standards of the UK Bribery Act 2010 to its conduct at home and abroad, and upholds all laws relating to anti-bribery and corruption in the jurisdictions in which it operates. Baleares International College, as a Spanish company (Baleares International School Mallorca S.L.), is directly subject to Spanish law, including:

- the Código Penal, Articles 419 to 427 (cohecho – bribery of public officials, Spanish or foreign) and Article 286 bis (corrupción en los negocios – bribery between private businesses);
- Article 31 bis of the Código Penal, under which a company can be criminally liable for offences committed for its benefit by its managers or staff, and liability may be excluded or reduced only where an adequate crime-prevention model meeting Article 31 bis has been adopted and effectively applied;
- Ley 2/2023, de 20 de febrero, reguladora de la protección de las personas que informen sobre infracciones normativas y de lucha contra la corrupción, which protects people who report breaches and requires employers with 50 or more workers to operate an internal reporting channel (sistema interno de información).

Under UK law, bribery and corruption are punishable by up to ten years of imprisonment and a fine. Under Spanish law, individuals face imprisonment and fines, and a company can face heavy fines, suspension of activities and exclusion from public contracts. If the group is discovered to have taken part in corrupt activities, it may be subjected to an unlimited fine, be excluded from tendering for contracts, and face serious damage to its reputation. With this in mind, Ariston Education is committed to preventing bribery and corruption in all business across the group, and takes legal responsibilities seriously.

All schools within the Ariston Education group apply this policy, interpreted and applied to be consistent with local laws and legislation. Should a conflict arise between any provision within the group policy and local legislation, local law prevails, but revision is only made to elements where direct conflict exists.

## Definition of Bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Regional Head of Schools (RHoS), Jonathan Dey, or a director.

## What is, and what is not, acceptable?

### Gifts and Hospitality

At **Baleares International College**, we accept normal and appropriate gestures of hospitality and goodwill (whether given to or received from third parties), so long as the giving or receiving of gifts meets the following requirements:

- it is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits;
- it is not made with the suggestion that a return favour is expected;
- it is in compliance with local law;
- it is given in the name of the company, not in an individual's name;
- it is given/received openly, not secretly;
- it is not selectively given to a key, influential person, clearly with the intention of directly influencing them;
- it is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the relevant RHoS;

- it is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you for helping with a significant project upon completion);
- it is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift;
- it does not include cash or a cash equivalent (e.g. a voucher or gift certificate);
- it is not above a certain excessive value, (€100).

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the relevant RHoS should be sought.

Gifts or hospitality given or received worth more than €100, and any gift from a supplier, must be declared to the Principal and recorded on the school's gifts and hospitality register; the Principal informs the RHoS. Gifts from suppliers should always be disclosed.

Exception: End-of-year gifts from parents to staff, including class-collection vouchers, may be accepted at the member of staff's discretion, but any such gift worth more than €100 must be reported to the Principal.

We recognise that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

Where it is inappropriate to decline the offer of a gift (e.g. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the relevant RHoS, who will assess the circumstances.

## Facilitation Payments and Kickbacks

Facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. They tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action. **Baleares International College** does not accept, and will not make, any form of facilitation payments of any nature.

Kickbacks are typically made in exchange for a business favour or advantage. **Baleares International College** does not allow kickbacks to be made or accepted.

**D**espite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- keep any amount to the minimum;
- ask for a receipt, detailing the amount and reason for the payment;
- create a record concerning the payment;
- report this incident to your line manager, the Operations and Business Manager (Fernando Vasquez) and the RHoS as soon as it is safe to do so.

## Political Contributions

**Baleares International College** will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates, as this may be perceived as an attempt to gain an improper business advantage.

### Charitable Contributions

**Baleares International College** accepts the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions made.

Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the relevant RHoS.

## Roles & Responsibilities

All employees of **Baleares International College** must ensure that they read, understand, and comply with the information and guidance within this policy, and with any training or other anti-bribery and anti-corruption information they are given.

All staff and other representatives of the school are 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 a reason to believe or suspect that an instance of bribery or corruption that breaches this policy has occurred or will occur in the future, they must notify the relevant RHoS.

If any employee breaches this policy, they may face disciplinary action, up to and including disciplinary dismissal under Article 54 of the Estatuto de los Trabajadores and the XII Convenio colectivo de enseñanza privada. **Baleares International College** has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

### What happens if I need to raise a concern?

- **How to raise a concern**

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to **Baleares International College**, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour could be considered bribery or corruption, you should speak to your line manager, the RHoS, a director or the Group Head of HR.

The school will familiarise all employees with its whistleblowing route so employees can vocalise their concerns swiftly and confidentially.

Concerns can also be raised in confidence through the school's internal information system under Ley 2/2023: concerns are raised in confidence with the Principal, Alison Colwell, who is the person responsible for the system in school, or, where they concern the Principal, with the Regional Head of Schools, Jonathan Dey (jonathan@orbital.education), and externally with the Autoridad Independiente de Protección del Informante (A.A.I.). People who report in good faith are legally protected from retaliation.

- **What to do if you are a victim of bribery or corruption**

You must inform the relevant RHoS as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

- **Protection**

If you refuse to accept or offer a bribe, or you report a concern relating to potential act(s) of bribery or corruption, we understand that you may feel worried about potential repercussions. **Baleares International College** will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

**Baleares International College** will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the relevant RHoS immediately.

## Training and Communication

As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

**Baleares International College** will provide training on this policy as part of the induction process for all new employees. Staff will also receive relevant training on how to adhere to this policy, and will be asked regularly to formally acknowledge that they will comply with this policy. The school will provide relevant further training to employees where we feel their knowledge of how to comply with the relevant legislation needs to be enhanced.

**Baleares International College**'s Anti-bribery and Anti-corruption Policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

## Monitoring and Review

**Baleares International College** keeps detailed and accurate financial records, and has appropriate internal controls in place to act as evidence for all payments made. The school will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and all staff should understand that gifts and acts of hospitality are subject to managerial review.

The administrators of Baleares International School Mallorca S.L., supported by the directors of Ariston Education, are responsible for monitoring the effectiveness of this policy and will review its implementation on a regular basis to assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice. Any necessary improvements will be applied as soon as possible.

Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Such feedback should be addressed to Alison Colwell (Principal, Sa Porrassa), Andrew Beavon (Principal, Sant Agustí) or the RHoS, Jonathan Dey.

This policy does not form part of an employee's contract of employment and **Baleares International College** may amend it at any time to improve its effectiveness at combatting bribery and corruption.

## Related Policies

This policy should be read in conjunction with the following documents:

- BIC Governance Policy
- Staff Code of Conduct
- Staff Handbook
- Safer Recruitment Policy
- Admissions Policy