

Anti-Bribery and Corruption Policy

(Applicable to Immigration & Education Services)

Purpose

AS Foreign Education Consultants Limited (hereafter named as **ASFE**) is committed to maintaining the highest ethical standards across all its operations in both the immigration and education sectors. This Anti-Bribery and Corruption Policy establishes ASFE's zero-tolerance stance towards bribery and corrupt practices and ensures compliance with relevant laws, including the UK Bribery Act 2010, the U.S. Foreign Corrupt Practices Act (FCPA), and equivalent international legislation.

This policy supports ASFE's goal of promoting transparency, fairness, and integrity in all business interactions, whether with clients, institutions, governments, or partners.

Scope

This policy applies to all individuals associated with ASFE, including:

- Employees (full-time and part-time)
- Consultants and advisors
- In-country representatives
- Subcontractors and support staff
- Any third party representing or acting on behalf of ASFE

It covers all activities related to:

- Immigration services, including Citizenship and Residency by Investment programmes
- Education services, including student placement, admissions, scholarships, and institutional engagement

Governance and Oversight

The ASFE Compliance Team is responsible for implementing and overseeing this policy. Key responsibilities include:

- Staff training and awareness



- Risk-based due diligence on partners and clients
- Monitoring of high-risk transactions and jurisdictions
- Investigating suspected violations

All concerns or suspected breaches must be reported to the designated Compliance Contact. Breaches of this policy may result in disciplinary action and, where necessary, legal consequences.

Policy Statement

ASFE strictly prohibits any form of bribery or corruption whether direct or indirect, offered or received, actual or attempted.

Prohibited conduct includes, but is not limited to:

- Offering payments or gifts to secure admission, fast-track visa approvals, or influence investment program decisions
- Accepting inducements from institutions or third parties in exchange for preferential treatment
- Providing or requesting unofficial “facilitation payments”
- Making political or charitable donations to gain business advantage

Bribery and corruption damage trust, violate laws, and are fundamentally against ASFE’s values.

Definitions

Bribery: Offering, promising, giving, or accepting anything of value with the intention of influencing a person’s actions or decisions in an official or professional capacity.

Corruption: Abuse of entrusted power for private gain, often involving bribery, fraud, or manipulation.

Examples of bribes:

- Cash or equivalents (e.g. gift cards, vouchers)
- Expensive gifts, hospitality, or entertainment
- Unjustified commissions or referral fees
- Offers of employment or internships

- Personal favours, particularly in relation to government officials or institutional staff

Even if the bribe is refused or unsuccessful, the attempt alone violates this policy.

Third-Party Conduct

ASFE may be held responsible for the actions of third parties acting on its behalf. All representatives, consultants, and service providers must:

- Comply with this policy and all applicable laws
- Undergo due diligence prior to engagement
- Operate transparently, especially when interacting with public bodies or educational institutions

Any third party suspected of unethical conduct must be reported immediately and, if necessary, disassociated from ASFE's operations.

Government and Institutional Interactions

ASFE often engages with government departments (e.g., immigration offices, consular services) and educational institutions (e.g., admissions offices, registrars). In these interactions:

- All communication must be professional, documented, and lawful
- No gifts, benefits, or payments may be made to influence decisions
- Hospitality must be modest, appropriate, and pre-approved if applicable
- Any appearance of impropriety must be avoided

ASFE's reputation depends on the transparency and legitimacy of these relationships.

Facilitation Payments

ASFE prohibits facilitation payments small, unofficial payments made to speed up routine processes (e.g., visa stamping, file processing). These are considered bribes under international law and are not allowed under any circumstances, regardless of local norms or practices.

Reporting and Whistleblower Protection

All ASFE team members and associates are encouraged to report suspicious behaviour or suspected breaches of this policy. Reports may be made to a line manager or directly to the Compliance Team.

ASFE will ensure:

- Confidentiality in handling reports
- Protection from retaliation for whistleblowers acting in good faith
- Prompt and impartial investigation of concerns

Training, Monitoring, and Enforcement

ASFE will provide regular training to employees and key partners to ensure understanding and adherence to this policy. Compliance is supported through:

- Ongoing monitoring and audits
- Clear procedures for handling client payments and institutional agreements
- Transparent documentation of all interactions involving sensitive decisions

Non-compliance will lead to disciplinary actions, including termination and referral to authorities if necessary.

Commitment to Integrity

ASFE's success in immigration and education consulting is built on trust, legal compliance, and ethical practice. We are committed to upholding the highest standards and expect the same from everyone associated with our brand.

Approved by: AS Foreign Education Consultants Limited Compliance Team

Effective Date: 01.01.2025

Next Review Date: 01.01.2026

Contact: compliance@asfeconsultants.com