

Anti-bribery policy

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1. Purpose of the policy

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure the Charity is conducted in a socially responsible manner. This policy applies to all the countries and territories in which the Charity operates.

2. Overall approach

The Bribery Act 2010 is arguably the toughest anti-bribery regime in the world. The Act imposes criminal liability on individuals and organisations in the event that employees, subsidiaries, agents or consultants pay or accept bribes in relation to the organisation's business anywhere in the world. The Trustees are fully committed to ensuring that the Charity operates both legally and ethically. Bribery or corruption in any form will not be tolerated. The Charity expects all employees, stakeholders, members of the Society and business partners to conduct business in a fair, honest and ethical manner at all times. The Charity prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement:

- to or from any person or company, wherever they are situated and whether they are a public official or body or private person or company;

- by any individual employee, agent, member or other person or body acting on the Trustees' behalf in order to gain any commercial, contractual or regulatory advantage for the Charity in a way which is unethical; or
- in order to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

The Charity recognises that market practice varies across the territories in which it operates and what is normal and acceptable in one place may not be in another. This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly declared and recorded:

- donations given to the Charity or to members of the Society for the benefit of the Charity;
- normal and appropriate hospitality;
- the giving of a ceremonial gift on a festival or at another special time;
- use of any recognised fast-track process which is available to all on payment of a fee; or
- the offer of resources to assist a person or body to make a decision more efficiently, provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If at any time a member of staff is in doubt as to whether a potential act constitutes bribery, the matter should be referred to a responsible person within the Charity. The prevention, detection and reporting of bribery is the responsibility of each individual working on behalf of the Charity. The Trustees operate a zero-tolerance approach to any attempts at bribery by, or of, its employees and associated persons and encourages all such individuals to report any suspected bribery activity to a responsible person within the organisation. You will be fully supported if you make a report of suspected bribery in good faith even if, following an investigation, there is no finding that bribery took place. In the event of any bribery activity being suspected, the Charity will carry out a full investigation and if any bribery activity is discovered, the Charity may invoke its disciplinary procedures, which could result in a finding of gross misconduct and immediate dismissal.

3. Policy Statements

- 3.1. It is policy to conduct all of our business in an honest and ethical manner;
- 3.2. Trustees take a zero-tolerance approach to bribery and corruption;
- 3.3. Trustees are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery;
- 3.4. Trustees will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate;
- 3.5. Trustees remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If the Charity is found to have taken part in corruption, it could face an unlimited fine and face damage to its reputation. Trustees therefore take our legal responsibilities very seriously.

4. Scope of the policy

This policy document applies to all employees of the Charity (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us and wherever located. It also applies to members of the Society.

The policy will be formally reviewed at least every three years.

In this policy, third party means any individual or organisation with whom we have contact, and includes suppliers, business contacts, advisers, other charities and government and public bodies, including their advisors, representatives and officials, politicians and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

This policy covers:

- **Bribes**

Employees must not engage in any form of bribery, either directly or through any third party. Specifically, employees must not bribe a foreign public official anywhere in the world.

- **Gifts**

Occasionally, other third parties may seek to reward staff members with a gift. Whilst the Charity has no desire to stop employees from receiving a small token of gratitude or appreciation, it needs to be recognised that there is the potential for abuse. In addition, some suppliers or contractors may offer 'reward schemes' which allow you to obtain free gifts or discount vouchers in return for ordering services or products on behalf of the Charity from that supplier or contractor. The Charity needs to be sure that its suppliers and contractors are competitive and that employees are acting in the best interests of the Charity when using a particular supplier or contractor.

The Charity does not believe that it is appropriate for staff members to accept anything of greater value than small tokens of appreciation from suppliers, contractors or from any other person or organisation with which the Charity has, or might have, business connections. This is because it is important to ensure that no employee acts in any way that is inconsistent with the integrity of the Charity by accepting a gift in circumstances where it could influence, or be seen to influence, that employee's business decisions or actions.

For the purposes of this policy, a 'gift' is deemed to be any payment or item given on an apparent ex gratia basis by any party in connection with your employment by the Charity.

Staff members are under an obligation to report the receipt of a gift, including the nature of the gift and the identity of the sender, to their Manager as soon as it is received. Failure to report the receipt of a gift from any party constitutes a disciplinary offence and will lead to disciplinary action up to and including dismissal.

If the gift is anything other than a small token of appreciation having no substantial financial value, members of staff will be required to return it to the sender with a polite letter thanking them and explaining it is the Charity's policy that employees should not receive gifts. In cases where the line manager determines that the gift constitutes a small token of appreciation for an employee as

a personal reward, the employee may, at the manager's discretion, be permitted to retain the gift. However, unless the sender of the gift specifically states or makes clear that it is intended for an employee as a personal reward, all gifts are deemed to be the property of the Charity and may be shared amongst other members of staff as appropriate.

Thus, small gifts that are genuinely given as a token of appreciation are acceptable, provided always that an employee properly declares the gift in line with this policy and provided the employee does not subsequently treat the sender of the gift more favourably than other clients, customers, suppliers or contractors.

If the Charity discovers a supplier or contractor has been used wholly or mainly because of the incentive of a free gift and, as such, the employee has not acted in the best interests of the Charity, this will also constitute a disciplinary offence and will lead to disciplinary action, which may lead up to and include dismissal.

This policy does not apply to promotional gifts i.e. items such as pens, mugs, calendars or stationery that bear the company name or logo of another organisation, provided these have no significant financial value.

- **Corporate hospitality**

Corporate hospitality means hospitality of any kind provided by the Charity or its staff to non-Charity employees in connection with the lawful business of the Charity. No corporate hospitality would normally be provided by the Charity, but where it is, all corporate hospitality expenses must be approved in advance by the appropriate line manager, before any commitments are made, taking into account what is reasonable and proportionate in the circumstances.

Corporate hospitality may also be received from another company, for example an invitation to a client's event. The Charity does not believe that it is appropriate for staff members to attend lavish, extraordinary or excessive corporate hospitality events held by customers, clients, suppliers, contractors or by any other person or organisation with which the Society has, or might have, business connections. This is because it is important to ensure that no employee acts in any way that is inconsistent with the integrity of the business by attending corporate hospitality events in circumstances where it could influence, or be seen to influence, that employee's business decisions or actions.

Staff members are under an obligation to report a corporate hospitality invitation that they would wish to attend, including the nature of the event and the identity of the person or organisation offering the hospitality, to their line manager as soon as the invitation is received. Failure to report the invitation, and then to attend the event without permission, constitutes a disciplinary offence and will lead to disciplinary action, which may lead up to and include dismissal.

- **Facilitation payments and kickbacks**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service, which one would normally be entitled to. It is strict policy that facilitation payments must not be paid. It is recognised, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or

his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to your line manager.

- **Political contributions**

The Society does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

- **Charitable contributions**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.

Please contact the Finance Director should you have any questions regarding this policy or the application of the risk management process across the Charity.

5. **Record keeping**

Members of staff must declare and keep a written record of all gifts accepted or offered, which will be subject to management review. Staff members must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy.

6. **How to raise a concern**

Members of staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If staff members are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries or concerns, these should be raised with their line manager or the Finance Director. If you feel you cannot raise it with these people, then please discuss with the Treasurer or Provincial.

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

It is important that you tell your line manager or the Director of Finance as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8. **Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

9. Communication

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

10. Responsibilities

The Trustees have overall responsibility for ensuring this policy complies with any legal and ethical obligations, and that everyone under the Charity's control complies with it. The Finance Committee has general responsibility on behalf of Trustees for monitoring the operation and effectiveness of our anti-bribery arrangements. The Director of Finance has primary and day-to-day responsibility for implementing this policy and for dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it, if appropriate. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. This policy does not form part of any employee's contract of employment and it may be amended at any time.