

Anti-Bribery Policy

1. Introduction

This policy is to assist and promote our values and expectations, and to ensure that sound ethical behaviour is always demonstrated within the workplace. We also intend for it to provide clarity when communicating with customers, partners, or suppliers, to ensure that our reputation is protected against any potential bribery claim. Its aim therefore is to limit the Association's exposure to bribery by:

- Setting out clear rules on bribery.
- Encouraging employees to be vigilant and report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting the Police and other appropriate authorities in any resultant prosecution.
- Taking firm and vigorous action against any individual involved in bribery.

In support of our commitment to maintaining the highest possible standards of business practice our stance on bribery is one of 'zero-tolerance'. Bribery is illegal and as such, has no place in our organisation.

2. The Policy

In accordance with the Bribery Act 2010, we prohibit the offering, giving, solicitation, or acceptance of any bribe:

- Whether cash or other inducement, regardless of size or value.
- To, or from, any person or organisation, wherever they are situated and whether they are a public official or body, private person, or Association.
- By any individual employee, agent, other person, or body acting on our behalf.
- To gain any commercial, contractual, or regulatory advantage for us in a way which is illegal or unethical.
- To gain any personal advantage, monetary exchange, or otherwise, for the individual or anyone connected with the individual.
- Including facilitation payments made to public officials for securing or accelerating routine processes and procedures.

3. Interpreting the Policy

It is not the intention of the policy to prevent normal and appropriate hospitality, or the giving and receiving of ceremonial gifts. However, such hospitality or gifts must be in moderation and not place any expectation on the recipient to reciprocate, either in like, or by performing, or failing to perform, any other task in return. If there is any doubt as to whether an action might constitute bribery, the matter should be referred to the Chair or Vice Chair for a decision.

4. Preventing and Reporting Bribery

All employees have a responsibility to prevent, detect, and report bribery. Any suspicion of bribery,



or attempted bribery, committed by or against an employee, agent, or other party acting on our behalf must be reported immediately to the Chief Executive or the Chair, or the Vice Chair if the CEO is not appropriate.

A gifts and hospitality register is in place to record any items or invitations of a value of £20 or more. All gifts and hospitality above this value must be recorded within the register.

Our Whistleblowing Policy and Procedure is in place to protect anyone reporting reasonable suspicions.

Any breach of these rules may result in disciplinary action being taken which is likely to result in summary dismissal on the grounds of gross misconduct.

