

## **ANTI-BRIBERY POLICY**

**Ownership.** This Policy is owned by the Board of RMA-TRMC.

### **THE LAW**

1. The Bribery Act 2010 makes illegal to offer, promise, give, request, agree, receive or accept bribes.

### **POLICY STATEMENT**

2. It is the policy of RMA-TRMC to conduct business in an honest and ethical manner. A zero-tolerance approach is applied to bribery and corruption at every level in the business. This policy provides guidance in accordance with the Bribery Act 2010 but if you are concerned about any business dealing, irrespective of the Act, you should report this immediately to your Manager or a Trustee.

3. This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (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 the Charity, its subsidiaries or their employees (collectively referred to as workers in this policy), whether located in the UK or overseas. It also applies to third parties. In this policy, third party means any individual or organisation you come into contact with during the course of your work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

### **PRINCIPLES**

4. The Charity has a zero tolerance of bribery and corruption. The Charity Business Ethics & Anti-Bribery Policy extends to all the Charity's business dealings and transactions in all countries in which it, or its subsidiaries and associates, operate. The Charity prohibits all forms of bribery whether they take place directly or through third parties. Any breach of the policy will be treated as Gross Misconduct. The policy is documented later in the Employee Handbook.

5. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. This may include offering a potential client tickets to a major sporting event but only if they agree to do business with the Charity. Bribes may not be obvious. For instance, if a supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in the business for their benefit, this would be unlawful. It would also be an offence to arrange to pay an additional amount to a foreign official to speed up an administrative process, such as clearing our goods through customs.

6. The aim of this policy is not however to prohibit normal and appropriate hospitality being given to, or received from, third parties. Gifts or hospitality must not, however, be given or received with the intention of influencing a third party to provide a business or personal advantage. Individuals should ensure that:

- a. The gift or hospitality offered or received complies with local law;

- b. It is given in the name of the Charity, not in your name;
  - c. It does not include cash or a cash equivalent (such as gift certificates or vouchers);
  - d. It is appropriate. For example, in the UK it is customary for small gifts to be given around Christmas time;
  - e. Considering the reason for the gift, it is appropriate in terms of type, value and timing;
  - f. It is given openly, not secretly; and
  - g. It is not offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a Director
7. It is not acceptable for individual (or someone on their behalf):
- a. To give, promise to give, or offer, payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward an advantage already given;
  - b. To accept payment from a third party that you know, or suspect, is offered with the expectation that it will obtain a business advantage for them or a business advantage will be provided by the Charity in return;
  - c. To accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation of a business advantage;
  - d. To threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy;
  - e. To engage in any activity that might lead to a breach of this policy
8. The Charity is required to keep financial records which will evidence the business reason for making payments to third parties. You must therefore declare all hospitality or gifts accepted or offered in the Charity's Gifts and Hospitality Register: Teams>RMA-TRMC>Useful Information>Gifts & Hospitality Register. You must also ensure that all expenses claims relating to hospitality, gifts or expenses incurred are submitted in accordance with the expenses policy and specifically record the reason for the expenditure. As a guide, you must report any hospitality to you worth more than £20. Any gift worth between £20 and £200 must also be logged in the Gifts & Hospitality Register, and gifts worth more than £200 must not be accepted unless they can be auctioned to raise funds for the Charity.
9. Any individual who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct or legal actions.

#### **LEAD STAFF MEMBERS**

10. DCE&COO

#### **TRAINING**

11. All staff will be briefed on this Anti-Bribery Policy through the Employee Handbook.

### **RECORD KEEPING**

12. Gift and Hospitality Register.

### **REVIEW**

13. This Policy is to be reviewed biennially or soon should the law, or Charity Commission/ Companies House/Fundraising Regulator/Information Commissioner guidance change.

14. The Charity will monitor the effectiveness of this policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. It does not form part of employee's contractual terms.

Signed

Dated

10 February 2022