

Adopted: 25<sup>th</sup> April 2017

## **ANTI-BRIBERY POLICY**

### **1.0 Why an Anti-Bribery policy?**

It is highly unlikely that anyone associated with us would wish to be – or have the opportunity to be – involved in bribery. However, bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

In this policy, 'third party' means any individual or organisation you come into contact with during the course of your work for us, 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.

### **2.0 Scope**

This policy applies to all trustees, employed staff and volunteers of Age UK Cambridgeshire & Peterborough (AUKCAP).

This policy does not form part of any employee's contract of employment and it may be amended at any time.

All employees and volunteers will be expected to sign a form to indicate they are aware of and will abide by this Policy.

### **3.0 What is bribery?**

A bribe is an inducement or reward offered, promised or provided in order to gain commercial, contractual, regulatory or personal advantage.

- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A member of staff asks for a gift in return for providing a service to a client;
- A third party requests that you provide employment or some other advantage to a friend or relative;
- You receive an invoice from a third party that appears to be non-standard or customised;
- You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- You are offered an unusually generous gift or offered lavish hospitality by a

third party;

#### **4.0 Gifts and hospitality**

This policy does not prohibit small gifts or appropriate hospitality (given and received) to or from third parties (see AUKCAP's *Gratuities policy, including Gifts, Tips and Bequests*).

#### **5.0 Employee Responsibilities**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for AUKCAP. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or supplier offers you something to gain an advantage with us, or indicates to you that a gift or payment is required to secure their business.

Our Whistle blowing policy offers guidance for those who feel concerned about reporting concerns.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Our normal financial controls should be followed to ensure all transactions are transparent.

#### **6.0 Review**

This policy will be reviewed within 36 months of adoption.