



THE BRITISH ATHLETES COMMISSION ANTI BRIBERY POLICY 2019

1. INTRODUCTION.

The British Athletes Commission (the BAC) is committed to the highest standards of ethical conduct and integrity in its business activities in the UK (and overseas). This policy outlines the BAC's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010.

The BAC will not tolerate any form of bribery by, or of, its employees, members or anyone acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

2. SCOPE OF THE POLICY.

This policy applies to all employees, members and associated persons acting for, or on behalf of, the BAC. Every employee and associated person acting for, or on behalf of, the BAC is responsible for maintaining the highest standards of business conduct.

Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation and standing of the BAC.

You are required to familiarise yourselves and comply with this is policy, including any updates that may be issued from time to time by the BAC.

3. BRIBERY ACT 2010.

The BAC is committed to complying with the Bribery Act 2010 in its our business activities in the UK (and overseas).

For the purpose of the Act, a bribe is a financial or other type of advantage that is offered or requested with the:

- Intention of inducing or rewarding improper performance of a function or activity; and
- Knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

Under the Bribery Act 2010 a criminal offence will be committed if:

- An employee, member or associated person acting for, or on behalf of, the BAC offers, promises, gives, requests, receives or agrees to receive bribes; or
- (An employee or associated person acting for, or on behalf of, the BAC offers, promises or gives a bribe to a foreign official with the intention of influencing that official in the performance of his/her duties (where local law does not permit or require such influence) if relevant); and
- The BAC does not have the defence that it has adequate procedures in place to prevent bribery by its employee or associated persons.



The BAC prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe.

The risk of bribery is likely to arise before (or after) the award or application for a major contract or a funding arrangement. Care should be taken to avoid inappropriate involvement with the bidders or contract holders.

The bribe might be cash, a gift or other inducements to, or from any person or company, whether a public or government official, official or a state-controlled industry, political party or a private person or company, regardless of whether the employee or associated person is situated in the UK or overseas.

The bribe might be made to ensure that a person or company importantly performs duties or functions to gain any commercial, contractual or regulatory advantage for the company in either obtaining or maintaining BAC business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

4. RECORDS.

You (as an employee or associated individual of the BAC) are required to take particular care to ensure that all BAC records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

You are also required to keep accurate, detailed and up-to-date records of all corporate hospitality

You are also required to keep accurate, detailed and up-to-date records of all corporate hospitality entertainment or gifts offered.

5. WORKING OVERSEAS.

If you conduct business on behalf of the BAC outside the UK you may be at greater risk of being exposed to bribery or unethical business conduct that UK based employees and owe a duty to the BAC to be extra vigilant when conducting international business.

All employees and associated persons are required to cooperate with the BAC's risk management procedures and to report suspicions of bribery to the CEO and Chair.

6. FACILITATION PAYMENTS.

The BAC prohibits employees or associated persons from making or accepting any facilitation payments. (These are payments made to government officials for carrying out or speeding up routine procedures).

7. CORPORATE ENTERTAINMENT, GIFTS, HOSPITALITY AND PROMOTIONAL EXPENDITURE.

The BAC permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:



- For the purpose of establishing or maintaining good business relationships;
- To improve the image and reputation of the BAC; or To present the BAC's services effectively, provided that it is:
 - Arranged in good faith; and
 - Not offered, promised or accepted to secure an advantage for the BAC or any of its employees or associated persons or to influence the impartiality of the recipient.

The BAC will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

This principle applies to employees and associated persons whether based in the UK or overseas. The BAC will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship.

The BAC will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that undue influence, or a particular business benefit was being sought.

Any gifts, rewards, or entertainment received from clients, public officials, suppliers or other business contacts should be reported immediately to the CEO or Chair. In certain circumstances, it may not be appropriate to retain such gifts and you may be asked to return the gifts to the sender, for example, where there could be a real or perceived conflict of interest.

Records and receipts must be supplied in accordance with the BAC's expenses policy. If you wish to provide gifts, to suppliers, clients or other business contacts, prior written approval from the CEO or Chair is required, together with details of the intended recipients, reasons for the gift and business objective.

8. RISK MANAGEMENT.

As a formal policy within the BAC, the Anti-Bribery policy will be incorporated into all BAC policies, and the Code of Conduct as defined in the Employee Handbook and all other related policies.

9. REPORTING SUSPECTED BRIBERY.

The BAC depends on you to ensure that the highest standards of ethical conduct are maintained in all its business and you are requested to assist the BAC and to remain vigilant in preventing, detecting and reporting bribery.

- Any concerns that you may have should be reported to the CEO or Chair as soon as possible. Issues that should be reported include:
- Any suspected or actual attempts at bribery
- Concerns that other employees or associated persons may be being bribed; or concerns that other employees or associated persons may be bribing third parties, such as clients or government officials.



- The CEO or Chair will thoroughly and promptly investigate any such reports in the strictest confidence. Employees will be required to assist in any investigation into possible or suspected bribery.
- Employees or associated persons who report in good faith will be supported by the BAC and the BAC will ensure that the individual is not subjected to detrimental treatment as a consequence of the report.
- Any instances of detrimental treatment by a fellow employee because a report has been made will be treated as a disciplinary offence.
- An instruction to cover up a wrongdoing is itself a disciplinary offence even if the instruction is from a person in authority and should be reported.

10. ACTION BY THE BAC.

The BAC will fully investigate any instances of alleged or suspected bribery and will invoke its disciplinary procedures if deemed necessary.

Employees suspected of bribery may be suspended from their duties whilst the investigation is being carried out proven allegations may result in a finding of gross misconduct and immediate dismissal.

The BAC will monitor and review this policy on a regular basis and reserves the right to amend and update the policy as required.

Adopted by: Board Adopted date: 18th March 2019 – TBC

Review by: Board Review date: tbc