

## **ANTI- BRIBERY AND CORRUPTION POLICY**

### **1. INTRODUCTION**

1.1 The Partnership prides itself on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a co-owned organisation and our collective commitment to acting with integrity throughout the Partnership.

1.2 These ethical standards (now reflected in the Bribery Act 2010) have long formed part of the culture of the Partnership. Indeed the Constitution states:-

*“Rule 96 - the Partnership’s relationships with its suppliers must be based, as with its customers, on honesty, fairness, courtesy and promptness. It looks for a similar attitude throughout its supply chains. In particular, the Partnership expects its suppliers to obey the law and to respect the wellbeing of their employees, their local communities and the environment.”*

*“Rule 101 - if a Partner receives a gift (other than an unsolicited tip in circumstances covered by the Partner Handbook) from someone with whom the Partnership deals, and he cannot reasonably and without embarrassment refuse it or return it to the donor, he must pass it on to the appropriate Partner dealing with local community involvement, so that he gains no personal benefit from it.”*

1.3 It is necessary to extend our policies to take account of the Act and also to extend their scope to include third parties who either act for the Partnership or on its behalf. (See paragraph 6 below).

### **2. POLICY STATEMENT**

2.1 It is the Partnership’s policy to conduct all of its business in an honest and ethical manner. The Partnership takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

2.2 The Partnership will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. Particularly, it remains bound by the laws of the UK, including the Bribery Act 2010, in respect of its conduct both at home and abroad.

### **3. WHO IS RESPONSIBLE FOR THE POLICY?**

3.1 The Partnership Board has overall responsibility for ensuring this policy complies with the Partnership’s legal and ethical obligations, and that all those under its control comply with it.

3.2 All levels of management within the Partnership and its Divisions will be responsible for ensuring that those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

#### **4. WHAT IS BRIBERY?**

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

#### **5. PROCEDURES**

5.1 In order to ensure the effective implementation of its Anti-Bribery and Corruption Policy, the Partnership will follow the guidance issued by the Ministry of Justice by ensuring that:

- there are procedures in place throughout the business to prevent bribery which are proportionate to the bribery risks it faces and the nature, scale and complexity of its business activities;
- its top-level management leads the commitment to preventing bribery by persons associated with the Partnership;
- it assesses the nature and extent of its exposure to potential external and internal risks of bribery on a periodic basis through the Partnership's risk management framework;
- it reviews and where necessary develops its due diligence procedures, taking a proportionate and risk based approach in order to mitigate identified bribery risks and expects third parties working with the Partnership or on its behalf to have in place its own policy and procedures to prevent bribery and corruption;
- it seeks to ensure that its bribery prevention policies and procedures are embedded and understood throughout the Partnership through internal and external communication, including training, that is proportionate to the risks faced;
- it monitors and reviews procedures designed to prevent bribery and make improvements where necessary.

5.2 In order to test the efficacy of implementation of the above procedures the following measures will be carried out at both corporate and divisional levels:

- Periodic risk management assessments;
- management self certification;
- establishment of training records.

## **6. WHO IS COVERED BY THE POLICY?**

This policy applies to all Partners working at all levels and grades, including directors, officers, senior managers and employees, whether permanent, fixed-term or temporary (“Partners” in this Policy) and (ii) consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, agents, sponsors, or any other person working with, or, on behalf of the Partnership wherever located (referred to as “Associated Third Parties” in this Policy).

## **7. RESPONSIBILITIES OF PARTNERS AND ASSOCIATED THIRD PARTIES**

- 7.1 Partners and Associated Third Parties must ensure that they read, understand and comply with this policy.
- 7.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Partnership or under its control. All Partners and Associated Third Parties are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 7.3 The Partnership’s zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of the Partnership’s business relationship with them and as appropriate thereafter.
- 7.4 Any Partner who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. A breach of this policy could result in the termination of the contractual relationship with Associated Third Parties if they are in breach of this policy.

## **8. HOW TO RAISE A CONCERN**

- 8.1 Partners and Associated Third Parties will be given the opportunity to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the appropriate manager or via the confidential Whistleblowing helpline. Concerns should be reported by following the procedure set out in the Whistleblowing Policy. A copy of the Whistleblowing Policy can be found on the Partnership’s intranet.
- 8.2 Partners must notify their managers or use the confidential Whistleblowing procedure helpline as soon as is reasonably possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future.

## **9. REPORTING AN ACT OF BRIBERY OR CORRUPTION**

It is important that Partners and Associated Third Parties tell the appropriate manager or report it to a Registrar via the confidential Whistleblowing helpline as soon as possible if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that they are a victim of another form of unlawful activity.

**10. PROTECTION**

- 10.1 The Partnership encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Partners and Associated Third Parties who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, should not be put in a position in which they feel worried about possible repercussions.
- 10.2 The Partnership is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.