



## Anti-Bribery Policy

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### Definition

Bribery is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in Debate Mate to ensure that no bribery occurs. The policy also extends to anyone working for or on our behalf, such as our university volunteers. We are committed to complying with the Bribery Act 2010 in all our business activities and will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

### What is prohibited?

The organisation prohibits employees or associated persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or organisation, whether a public or government official, official of a state-controlled industry, political party or a private person or organisation, 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 organisation improperly performs duties or functions (for example, by not acting impartially or in good faith or in accordance with their position of trust) to gain any commercial, contractual or regulatory advantage for the organisation in either obtaining or maintaining organisation business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

This prohibition also applies to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents or sub-agents, sponsors or sub-sponsors, joint-venture partners, advisors, customers, suppliers or other third parties.

### Reporting suspected bribery

You are encouraged to report any concerns you may have to your line manager, or another manager as appropriate, as soon as possible. Please refer to the whistleblowing policy for details of how to report a suspected bribery issue, and how we will investigate the allegation.

We may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police. We will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

### Business gifts

From time to time, you might be offered a gift by a customer, supplier or other person. This could be a small item, or something of considerable value. All gifts, however small, must be reported to your line manager and recorded. If the gift is anything other than a small token of appreciation, and has a substantial financial value, then it must not be accepted. If a gift is offered and then refused because of its value, this must also be reported to your line manager.

This policy does not apply to promotional gifts, i.e. items such as stationery or pens that bear the logo or organisation's name of another organisation, provided that these have no significant value.

### Hospitality

From time to time, you might be invited to a hospitality event by a customer, supplier or other person. You must report all such invitations to your line manager and permission must be given before you accept any invitation.

**Offering gifts and hospitality**

We do not offer promotional gifts at any time. You must not offer any gifts, no matter how small, without prior written permission from a Director.

We occasionally run hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. You must not organise any additional hospitality event without seeking authority from a Director.

**Donations to organisations**

We may on occasion make donations to charity, and/or support fundraising events involving employees. You must not make any such donations on the Company's behalf without prior permission.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

**Expenses**

Any expenses claims that give rise to concern will be fully investigated.

**Due Diligence**

As a business we will undertake all measures proportionate to our business to ensure that we know exactly who we are dealing with to help to protect our organisation. All staff and volunteers undergo a DBS criminal record check and we always ask for at least two references for employees that join the company.

**Disciplinary action**

If you are found to have offered or accepted a bribe, you will face disciplinary action which could include dismissal for gross misconduct. You should also note that bribery is a criminal offence that may result in unlimited fines and up to 10 years' imprisonment.

**Ongoing review**

The organisation will regularly review its approach to ensure adherence to this policy and to ensure that the policy is fit for purpose.