



ETHICS, ANTI-BRIBERY & CORRUPTION POLICY

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<i>Lead</i>	Jonathan Andrew Greenwood
<i>Author/Lead:</i>	Denise Read



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ETHICS, ANTI-BRIBERY & CORRUPTION POLICY

1. POLICY STATEMENT

It is the policy of Group Hug, a Social Enterprise to conduct business in an honest and ethical manner. As part of that, Group Hug 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. PURPOSE

Group Hug will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which it conducts business, including, in the UK, the Bribery Act 2010 (the **Act**), which applies to conduct both in the UK and abroad.

3. SCOPE AND APPLICABILITY

This policy applies to all individuals volunteering for, or on behalf of Group Hug at all levels and grades, wherever located, including consultants, agents, sponsors and any other person who performs services for or on behalf of Group Hug, (collectively referred to as **Volunteers** in this policy).

In this policy, **Third Party** means any individual or organisation which Volunteers come into contact with during the course of work and the running of Group Hug's volunteering business, and includes actual and potential customers, intermediaries, advisers, government and public bodies (including their advisers, representatives and officials), politicians and political parties.

4. WHAT IS BRIBERY?

A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Act, namely:

- giving or offering a bribe
- receiving or requesting a bribe



- bribing a foreign public official

Group Hug may also be liable under the Act if it fails to prevent bribery by an associated person (including, but not limited to Volunteers) for Group hug's benefit.

5. GIFTS AND HOSPITALITY

This policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from Third Parties unless otherwise specifically stated. However, we have specific internal policies and procedures which provide guidance to Volunteers as to what is to be regarded as normal and appropriate gifts and hospitality in terms of financial limits, subject to the principles set out below (the **Overriding Principles**), namely that any gift or hospitality:

- must not be made with the intention of improperly influencing a Third Party or Worker to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits
- must comply with local law in all relevant countries
- must be given in the name of the organisation, not in an individual's name
- must not include cash or a cash equivalent
- must be appropriate in the circumstances
- must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift
- must be given openly, not secretly

Group Hug appreciates that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable both in the UK and any other relevant country. The intention behind the gift should always be considered.

6. WHAT IS NOT ACCEPTABLE?

It is not acceptable for any Volunteer, (or someone on their behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that they or Group Hug will improperly be given a business advantage, or as a reward for a business advantage already improperly given
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate or expedite a routine procedure
- accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage



- accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by Group Hug in return
- threaten or retaliate against another Volunteer who has refused to commit a bribery offence or who has raised concerns under this policy
- engage in any activity which might lead to a breach of this policy.

7. FACILITATION PAYMENTS AND “KICKBACKS”

We do not make, and will not accept, facilitation payments or “kickbacks” of any kind, such as small, unofficial payments made to secure or expedite a routine government action by a government official, or payments made in return for a business favour or advantage.

8. RECORD KEEPING

We keep appropriate financial records and have appropriate internal controls in place which evidence the business reason for gifts, hospitality and payments made and received.

9. RESPONSIBILITIES AND RAISING CONCERNS

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

Volunteers are required to notify Group Hug as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or if they are offered a bribe, 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.

Any Volunteer who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with non-employee Volunteers if they breach this policy.

10. TRAINING AND COMMUNICATION

Training on this policy is provided for all Volunteers and our zero-tolerance approach to bribery and corruption will, where appropriate, be communicated to all parties we are involved with.



11. MONITORING AND REVIEW

Group Hug monitors the effectiveness and reviews the implementation of this policy at appropriate intervals, considering its suitability, adequacy and effectiveness. Any improvements identified are made as soon as possible. Internal control systems and procedures are also subject to regular review to provide assurance they are effective in countering any risks of bribery and corruption.

All Volunteers are aware that they are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

12. IMPLEMENTATION OF POLICY

This Policy shall be deemed effective as of 16th May 2021. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.