

## SHAP ANTI-BRIBERY POLICY

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### PURPOSE

It is SHAP's objective to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and implementing and enforcing effective systems to counter bribery.

This Anti-Bribery Policy demonstrates SHAP's implementation of laws relevant to countering bribery and corruption, including the Bribery Act 2010.

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### SCOPE

This policy is aimed at the SHAP Board, Secretariat, recipients of SHAP contracts, SHAP Associates and SHAP volunteers. It is intended to clearly explain SHAP's zero-tolerance approach to bribery and corruption.

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### POLICY STATEMENT

This Anti-Bribery Policy requires that any individual working on behalf of SHAP must not either:

- Offer, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person, organisation or company;
- Gain or retain any commercial, contractual or regulatory advantage through unethical or illegal means.

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### DEFINITIONS

**Bribery** is the offer, promise, giving, demanding or accepting of an advantage as an inducement for an action which is illegal, unethical, a breach of trust or the improper performance of a contract.

**Inducement** can take the form of gifts, hospitality, fees, rewards, jobs, favours or other advantages.

**Corruption** is the misuse of entrusted power for personal gain.

**Third party** means any individual or organisation you come into contact with during the course of your work with SHAP, and includes actual and potential customers, subcontractors, joint venture partners, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

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## PRINCIPLES

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if SHAP is found to have taken part in corruption, it could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. The Board therefore takes its legal responsibilities very seriously.

SHAP receives funding from public sector organisations in the form of grants and membership fees. SHAP therefore abides by the standards required by public sector organisations for their own staff, partners and contractors. Contractors and other organisations with whom SHAP does business are required to have a similar culture.

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## EXAMPLES OF BRIBERY

A bribe is an inducement or reward offered, promised or received in order to gain any commercial, contractual, regulatory or personal advantage. It might include offering a potential joint venture partner tickets to a major sporting event, but only if they agree to do business with SHAP, or a supplier giving a job to a family member but making it clear that in return they expect you continue to do business with them.

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## WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already 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 that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by SHAP in return;

- Threaten or retaliate against another SHAP member who has refused to commit a bribery offence or who has raised concerns under this policy;
- Engage in any activity that might lead to a breach of this policy.

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## FACILITATION PAYMENTS AND KICKBACKS

SHAP does not make, and will not accept, facilitation payments or 'kickbacks' of any kind. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

If you are asked to make a payment on behalf of SHAP, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with SHAP's Secretariat or Board member.

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## DONATIONS

Any approvals for charitable donations must be approved by the SHAP Board. SHAP will only make charitable donations that are legal and ethical. As an apolitical organisation, SHAP does not make contributions to political parties.

Any donations received by SHAP will be made on the understanding that they will be used to either support the general mission and objectives of SHAP or a particular piece of work where specified and will not gain any business favour or advantage.

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## SPECIFIC BUSINESS SUPPORT PAYMENTS

Payments received by SHAP to pay for a specific business activity by a third party will be subject to a contract and/or service level agreement stating precisely the level of activity being procured and the expected outputs. The third party should expect to receive the full level of outputs being procured but will not gain any additional business favour or advantage beyond the payments for the work.

Contracts agreed between third parties and SHAP will be reported to SHAP's board to ensure transparency and accountability.

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## INDIVIDUAL'S 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 with and for SHAP. All those associated with SHAP are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify a member of the SHAP Board 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 customer or potential joint venture partner offers something to gain a business advantage with SHAP or indicates that a gift or payment is required to secure their business.

SHAP reserves the right to terminate any contractual relationships if this policy is breached.

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## RECORD KEEPING

SHAP must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

The Board, Secretariat, Associates and Contractors should record all hospitality or gifts accepted or offered above the value of £10, which will be subject to review by the Board. The Chairman will keep a record of all declarations.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as customers, subcontractors, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

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## HOW TO RAISE A CONCERN

Any concerns about any issue or suspicion should be raised at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with a member of the SHAP Board.

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## WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION

It is important that you tell a member of the SHAP Board as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

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## REVIEW

This policy will be reviewed every three years or sooner if legal or regulatory changes take place.

Signed:

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SHAP Chairman

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Date

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## **POLICY CONTROL**

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