

ANTI-BRIBERY POLICY

I INTRODUCTION

Yorkshire Sport Foundation (YSF) is committed to the highest standards of ethical conduct and integrity in its business activities. This policy outlines our position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. YSF will not tolerate any form of bribery by, or of, its employees, consultants, Board members or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

2 SCOPE OF THIS POLICY

This policy applies to all employees of the organisation, and to temporary workers, consultants, volunteers, Board members or contractors acting for, or on behalf of, YSF ("associated persons"). Every employee and associated person acting for, or on behalf of, YSF 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 company.

YSF may also face criminal liability for unlawful actions taken by its employees or associated persons under the Bribery Act 2010. All employees and associated persons are required to familiarise themselves and comply with this policy, including any future updates that may be issued from time to time by YSF.

This policy covers:

- the main areas of liability under the Bribery Act 2010;
- the responsibilities of employees and associated persons acting for, or on behalf of, the organisation; and
- the consequences of any breaches of this policy.

Bribery Act 2010

YSF is committed to complying with the Bribery Act 2010 in all its business activities. Under the Bribery Act 2010, 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; or
- knowledge or belief that accepting such a reward would constitute the improper performance of such a function or activity.

A relevant function or activity includes any activity performed in the course of a person's employment, or on behalf of another organisation or individual, where the person performing that activity is expected to perform it in good faith, impartially, or in accordance with a position of trust.

A criminal offence will be committed under the Bribery Act 2010 if:

- an employee or associated person acting for, or on behalf of, YSF offers, promises, gives, requests, receives or agrees to receive bribes;
- YSF does not have the defence that it has adequate procedures in place to prevent bribery by its employees or associated persons.

All employees and associated persons are required to comply with this policy, in accordance with the Bribery Act 2010.

3 INTRODUCTION

What is prohibited?

YSF 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, regardless of whether the employee or organisation 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 YSF 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, agents, sponsors, partners, advisors, customers, suppliers or other third parties.

Records

Employees and, where applicable, associated persons, are required to take particular care to ensure that all YSF 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.

Due diligence should be undertaken by employees and associated persons prior to entering into any contract, arrangement or relationship with a potential supplier of services, agent, consultant or representative.

Employees and associated persons are required to keep accurate, detailed and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered over the value of £5. This spreadsheet is in the register on Sharepoint (1.5).

4 CORPORATE ENTERTAINMENT, GIFTS AND HOSPITALITY

Principle

YSF permits corporate entertainment, gifts and hospitality that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the organisation; or
- to present YSF's services effectively;

provided that it is arranged in good faith; and not offered, promised or accepted to secure an advantage for YSF or any of its employees or associated persons or to influence the impartiality of the recipient.

YSF will authorise only reasonable, appropriate and proportionate entertainment expenditure. This policy does not prohibit normal and appropriate hospitality and entertainment with clients (please see the organisation's expenses policy). However, such practices must be proportionate, reasonable and made in good faith. Clear records must be kept.

This principle applies to employees and associated persons.

Procedure

Employees and, where relevant, associated persons should submit requests for proposed hospitality well in advance of proposed dates to their line manager.

Employees are required to set out in writing:

- the objective of the proposed client entertainment or expenditure;
- the identity of those who will be attending;
- details and rationale of the proposed activity.

YSF will approve business entertainment proposals only if they demonstrate a clear business objective and are appropriate for the nature of the business relationship. YSF 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 (for example prior to a tendering exercise).

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported immediately to your line manager. In certain circumstances, it may not be appropriate to retain such gifts or be provided with the entertainment and employees and associated persons may be asked to return the gifts to the sender or refuse the entertainment, for example where there could be a real or perceived conflict of interest. As a general rule, small tokens of appreciation (generally under £5), such as flowers or a bottle of wine, may be retained by employees.

If an employee or associated person wishes to provide gifts to suppliers, clients or other business contacts, prior approval from your line manager is required, together with details of the intended recipients, reasons for the gift and business objective. Employees and, where applicable, associated persons must supply records and receipts, in accordance with YSF's expenses policy.

5 CHARITABLE AND POLITICAL DONATIONS

YSF does not make donations to any political parties/charities. Employees and associated persons are not permitted to make any charitable and political donations to organisations on behalf of the organisation.

6 REPORTING SUSPECTED BRIBERY

Principle

YSF depends on its employees and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and associated persons are requested to assist YSF and to remain vigilant in preventing, detecting and reporting bribery.

Employees and associated persons are encouraged to report any concerns that they may have to their line manager 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.

Procedure

Any incidents of suspected bribery should be reported immediately to your Line manager who will thoroughly and promptly investigate this initially in the strictest confidence. Employees and associated persons will be required to assist in any investigation into possible or suspected bribery.

Employees will also be required to comply with YSF's whistleblowing policy.

Employees or associated persons who report instances of bribery in good faith will be supported by the organisation. YSF will ensure that the individual is not subjected to detrimental treatment as a consequence of his/her report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, employees and associated persons should not agree to remain silent. They should report the matter to their line manager.

When an individual reports suspected instances of bribery, YSF will process any personal data collected in accordance with its data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the report of bribery.

7 ACTION BY YSF

YSF will fully investigate any instances of alleged or suspected bribery. Employees suspected of bribery may be suspended from their duties while the investigation is being carried out. YSF will invoke its disciplinary procedures where any employee is suspected of bribery, and proven allegations may result in a finding of gross misconduct and immediate dismissal. YSF may terminate the contracts of any associated persons, including consultants or other workers who act for, or on behalf of, YSF who are found to have breached this policy.

YSF 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. YSF will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

8 REVIEW OF PROCEDURES AND TRAINING

YSF will regularly communicate its anti-bribery measures to employees and associated persons. The Chief Executive will monitor and review the implementation of this policy and related procedures on

a regular basis, including reviews of internal financial systems, expenses, corporate hospitality, gifts and entertainment policies.

Employees and those working for, or on behalf of, YSF are encouraged to contact the HR and OD Manager with any suggestions, comments or feedback that they may have on how these procedures may be improved.

YSF reserves the right to amend and update this policy as required. For the avoidance of doubt, this policy does not form part of employees' contracts of employment.