

BRIBERY PREVENTION, GIFTS AND HOSPITALITY POLICY & PROCEDURES

1. Introduction

1.1 This policy defines standards and guidelines in relation to adherence to the anti bribery measures and standards that should apply to the acceptance and provision of gifts and hospitality. In particular, the policy is designed to comply with The Bribery Act 2010.

1.2 The policy is set out under the following headings:

- anti-bribery policy;
- dealing with contractors, agents and business partners;
- giving gifts and hospitality;
- receiving gifts and hospitality;
- compliance;
- conflicts of interest policy;
- reporting bribery, corruption and suspected non-compliance with this policy.

2. Anti-bribery policy

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2.1 IPPAG values its reputation for ethical behaviour and financial probity and reliability. IPPAG recognises that any involvement in bribery is illegal and will reflect adversely on its image and reputation.

2.2 IPPAG prohibits the offering, giving, soliciting or the acceptance of any bribe in whatever form to or from any person or company, public or private by any council member, member of staff, contractor, consultant, agent, overseas agent, external examiner and any non-employee service provider engaged on IPPAG business for whatever reason.

2.3 The prevention, detection and reporting of bribery is the responsibility of all staff.

3. Dealing with contractors, agents and business partners

3.1 The Bribery Act 2010 highlights two specific types of bribery that could lead to prosecution of IPPAG:

- the liability to prosecution if a person associated with it bribes another person, where an associated person is one who performs services on or behalf of the organisation; and

- bribery of a foreign public official, where an official is one who holds a legislative, administrative or judicial position in a territory or country outside the UK.

3.2 This means that IPPAG needs to take care to ensure that any contractors, agents or business partners acting on its behalf comply with the Act.

3.3 It is therefore essential that contractors and agents acting on IPPAG's behalf are made aware of IPPAG's anti-bribery policy, through IPPAG's terms and conditions or through the tendering process for larger contracts. In the case of international agents, reasonable due diligence must be carried out to ensure that they are not acting in a way that would compromise IPPAG.

4. Giving gifts and hospitality

4.1 Staff may not, directly or through others, offer or give any, money, expensive or valuable gift, hospitality or other thing of value to an official, employee or representative of any supplier, customer or any other organisation, if doing so could reasonably give the appearance of influencing the organisation's relationship with IPPAG.

4.2 Staff may:

- give gifts of a nominal value (such as IPPAG promotional products);
- with management approval, provide meals and other entertainment at venues outside IPPAG, provided that the expenses are kept at a reasonable level. For the avoidance of doubt, the per capita cost of a meal should not exceed £100 and would normally be much less;

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5. Receiving gifts and hospitality

5.1 An employee or any member of their family should not, directly or through others, solicit or accept money, expensive or valuable gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

5.2 Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence such situations as the outcome of a tender or the award of business (contract) or the use of IPPAG's Intellectual Property or other assets, or to benefit personally or for the benefit of any person connected to that person.

5.3 Unless you have been informed otherwise you may accept:

- a gift of nominal value, such as a promotional product, when it is customarily offered to others having a similar relationship with that individual or organisation;
- customary meals or entertainment provided that the expenses are kept at a reasonable level.

5.4 For the avoidance of doubt:

- gifts with a value of more than £50 and hospitality expected to cost in excess of £100 should be authorised by your line manager ;
- gifts or hospitality in excess of £250 should be authorised by the Managing Director;

5.5 If an excessive gift or hospitality is found to have been accepted, then your manager will discuss the circumstances with you and agree how to deal with it e.g. a gift can be returned or steps can be taken to ensure that the acceptance of hospitality does not influence a decision or situation in favour of the giver. If excessive gift(s) or hospitality are accepted on more than one occasion or are found to have influenced decisions inappropriately, against IPPAG policy (or potentially illegally), then appropriate disciplinary procedures will followed.

6. Compliance

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6.1 All staff are required to comply with The Bribery Act 2010. The CEO is responsible for IPPAG's policy in relation to The Bribery Act 2010. Contact the CEO if further guidance is required.

7. Conflicts of interest policy

7.1 A conflict of interest occurs when you advance a personal interest (or that of others with whom you are connected) at the expense of IPPAG.

7.2 Reference should be made to IPPAG's policy on declarations of interest and the register of interests.

8. Reporting bribery, corruption and non-compliance with this policy

8.1 If you know of, or have good reason to suspect that, an unlawful or unethical situation or that you suspect that either an act of bribery or non-compliance to this policy has occurred; you should report the matter to your Line Manager. Should reporting in this way be inappropriate, you should report it to the CEO.