FIELDS OF LIFE TRUST (FOLNI)

ANTI-BRIBERY & CORRUPTION POLICY

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1.0	24.02.22	TG	Document reviewed & approved by Board.

Introduction

Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent them. Our legal obligations are primarily governed by the Bribery Act 2010.

Involvement in bribery and corruption exposes the organisation and relevant individuals to a criminal offence. It will also damage our reputation and the confidence of those with whom we work or have dealings of any kind.

Our position is simple – we conduct our affairs to the highest legal and ethical standards. We will not be party to corruption or bribery in any form. All of us must work together to ensure that our organisation remains untainted by bribery or corruption.

This policy is a crucial element of that effort and is the personal responsibility of the CEO, it has the full support of the trustees and it is our commitment to make sure it is followed. However, the policy needs the full support of you, our staff, to make it work.

This policy sets out the steps all of us must take to prevent bribery and corruption in order to comply with relevant legislation and our requirements.

Definitions and prohibition on bribery and corruption

‘Bribery’ is the giving or accepting of gifts, money, hospitality or other favours in return for providing something of value to or from another person. The purpose of this policy is to set out our policy to combat bribery.

‘Corruption’ is the misuse of office or power for personal gain.

You are not permitted to: -

- accept any financial or other benefit from any person in return for providing a favour
- request a financial or other benefit from any person in return for providing a favour
- offer any financial or other benefit to any person in return for providing a favour.
- threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption

Any employee who is concerned that he or she is potentially being bribed or that someone is acting corruptly should report this matter to management immediately.

Gifts

You are not permitted to solicit gifts from any person or organisation with whom we have dealings of any kind.

From time to time suppliers or other persons might offer you a gift. All gifts, however small, must be reported to your line manager. We may require that the gift be returned to the person who gave it. If this is the case, we will write to the giver of the gift explaining the reasons why the gift cannot be accepted.

Hospitality

You are not permitted to solicit an invitation to a hospitality event from suppliers or those we have dealings with.

From time to time persons you deal with in your course of work might invite you to a hospitality event. All such invitations must be reported to your line manager. Permission must be given by your line manager before you accept any invitation of hospitality.

Offering gifts and hospitality

If a gift is authorised by your line manager you are entitled to give it to the appropriate individuals. A record must be kept of all gifts given.

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

Responsibilities of managers

Managers are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees reporting to the manager. If managers are concerned about any actions, they should contact the CEO immediately for advice.

What to do if you think something is wrong

Each of us has a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in our organisation.

If you are offered a bribe, or are asked to make one, or if you discover or suspect that any bribery or corruption has occurred or may occur, you must notify your manager or, if the allegation is against your manager, to another senior manager as soon as possible. You must make your report as soon as reasonably practicable and you may be required to explain any delays.

Disciplinary action

Any employee found to have offered or accepted a bribe or hospitality in contravention with the terms of this policy will face disciplinary action which could include dismissal for gross misconduct.