



## Anti Bribery Policy

The Bribery Act 2010, which came into force on 1 July 2011, makes it an offence for a UK national or person located in the UK to pay or receive a bribe, either directly or indirectly. The Bribery Act covers transactions that take place in the UK or abroad, and both in the public or private sectors.

### Introduction

The Polehampton Charity is committed to uphold sound, responsible and fair business operations. It is committed to promoting and maintaining the highest possible ethical standards in relation to all its business activities. The Polehampton Charity's reputation for maintaining lawful business practice is of paramount importance to it and this policy is designed to preserve these values.

The Polehampton Charity therefore has a zero-tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships wherever it operates and implementing and enforcing effective systems to counter bribery.

### Gifts and entertaining

The Charity will maintain a register of all gifts and entertaining (including storing receipts) by the Trustees and associated individuals. It is the responsibility of the Trustee or associated individual to notify the designated owner of that register (Clerk to Trustees) of any such events.

### Reporting a suspected event

Should a situation arise when you suspect that bribery or corruption has taken place, you must immediately report it to the charity's designated individual. For avoidance of doubt, this includes reporting your own potential wrongdoing.

The designated individual will escalate the matter to the Chair of Trustees who will investigate and determine a recommended course of action.

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