



ANTI-BRIBERY POLICY [FRG013]

BRITISH TRIATHLON'S VIEWS ON BRIBERY

British Triathlon is committed to implementing and enforcing effective systems to counter bribery. Therefore, it is British Triathlon's policy to conduct all aspects of its business in an honest and ethical manner at all times.

This policy applies to all individuals working for British Triathlon, including anyone providing services to British Triathlon such as consultants, or contractors.

POLICY AIM

The aim of this policy is to help British Triathlon act in accordance with the Bribery Act 2010, maintain the highest possible standards of business practice, and advise individuals of the Company's 'zero-tolerance' to bribery.

THE LAW

Under UK law (UK Bribery Act 2010), bribery and corruption is punishable for individuals by up to ten years' imprisonment. If British Triathlon is found to have taken part in the corruption or lacks adequate procedures to prevent Bribery, it could face an unlimited fine and be excluded from tendering for Government contracts.

POLICY STATEMENT

This policy applies to all permanent and fixed-term staff employed by British Triathlon, and any contractors, consultants, Board of Directors or other persons acting under or on behalf of British Triathlon.

British Triathlon will not:

1. Make contributions of any kind with the purpose of gaining any commercial advantage.
2. Provide gifts or hospitality with the intention of persuading anyone to act improperly, or to influence a public official in the performance of their duties.
3. Make, or accept, "kickbacks" of any kind.

British Triathlon will:

4. Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
5. Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

6. See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken.

EMPLOYEE RESPONSIBILITY

Employees must not:

7. Accept any financial or other reward from any person in return for providing some favour.
8. Request a financial or other reward from any person in return for providing some favour.
9. Offer any financial or other reward from any person in return for providing some favour.

NON COMPLIANCE

STAFF

Failing to observe British Triathlon's policy may lead to disciplinary action in accordance with British Triathlon's Disciplinary Policy.

VISITORS

In the event of a breach of the policy by other organisations, or individuals, British Triathlon will take appropriate action.

MONITORING POLICY

The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

The following will be monitored:

10. That all individuals working for British Triathlon are advised of the policy.
11. Assessment of any reported incident or related occurrence.
12. The maintenance of a British Triathlon bribery/hospitality registers through updates from each department.
13. Monitoring of the policy is essential to assess how effective British Triathlon has been to establish control of its obligations.

DEFINITIONS

Bribe is a financial or other advantage offered or given to anyone to persuade them to or reward them for performing their duties improperly, or, with the intention of influencing them in the performance of their duties.

Hospitality is the practice of being hospitable, this includes the reception and entertainment of guests / visitors.

Kickbacks or facilitation payments are typically small payments made in return for a business favour or advantage.

REVIEWING POLICY

This policy will be reviewed annually and, if necessary, revised in the light of legislative or organisational changes. Improvements will be made by learning from experience and the use of an established annual review.

POLICY AMENDMENTS

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Chief Executive to see that all relevant employees receive notice and training if necessary.

Revised date	-	Adopted by Board	Dec 2014
Reviewed by Board	SMT, TEMB, BTF Board	Review date	Dec 2016