

THE SABRE TRUST BRIBERY POLICY

1. INTRODUCTION

1.1 The Sabre Trust is committed to implementing and enforcing effective systems to counter bribery. It is The Sabre Trust's policy to conduct all aspects of its activity in an honest and ethical manner at all times.

1.2 The Sabre Trust takes a zero-tolerance approach to any act of bribery and/or corruption and expects everybody to conduct themselves in a professional manner at all time when representing us.

2. THE PURPOSE OF THE POLICY

2.1 The aim of this policy is to help The Sabre Trust act in accordance with the Bribery Act 2010, maintain the highest possible standards of operation and advise individuals of its zero-tolerance to bribery.

2.2 Under the Bribery Act 2010, bribery and corruption is punishable for individuals by up to ten years imprisonment. If The Sabre Trust is found to have taken part in corruption or lacks adequate procedures to prevent bribery, it could face an unlimited fine amongst other sanctions.

2.3 British Fencing is committed to implementing effective systems and procedures and enforcing them to counter bribery.

3. THE SCOPE OF THE POLICY

The policy applies to:

3.1 All Trustees whether full-time, part-time or temporary or voluntary;

3.2 All volunteers who have positions of authority within The Sabre Trust;

3.3 Any consultants doing commissioned work for The Sabre Trust;

3.4 Any contractors undertaking work for The Sabre Trust; and

3.5 Any other person providing services to The Sabre Trust.

3.6 For the purposes of this document, the term 'all Colleagues' will include all of the above and 'a Colleague' shall mean any one of the above.

4. DEFINITION OF A BRIBE

A bribe is a financial inducement or other advantage offered or given:

4.1 To or from any person or organisation to persuade them to/or reward them for performing their duties improperly; or

4.2 To or from any public official with the intention of influencing that person or another in performing their duties.

5. GIFTS AND HOSPITALITY

5.1 In certain circumstances, gifts and hospitality may amount to bribery and all Colleagues must comply strictly with British Fencing's appropriate policies in respect of gifts and hospitality.

5.2 The conduct of colleagues must always be above any suspicion of impropriety or conflict of interest. As a consequence, they should never receive benefits of any kind from a third party which might reasonably be thought to compromise their personal judgement or integrity. In this field, perception is as important as reality.

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5.3 To ensure openness and transparency, all hospitality and entertainment worth over £50 offered (to or by TST) whether accepted or received must be recorded in the Gifts and Hospitality Register maintained by the Chairman.

5.4 Corporate hospitality can be provided and/or received that is reasonable and proportionate to the needs of the organisation to generate and/or maintain good relations with potential stakeholders.

5.5 This policy does not prohibit giving and receiving promotional gifts of low value to a maximum of £100 Sterling and normal and appropriate hospitality. No gift in excess of this value may be accepted or given without the approval of the Chairman (up to £500) or Board of The Sabre Trust (over £500). Any gift offered and then refused because of its value must be reported to the Chairman.

5.6 Giving gifts and hospitality

- Colleagues must not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a third party in the performance of his/her duties.
- Colleagues may not, directly or through others, offer or give any, money, 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 The Sabre Trust.
- Colleagues may:
 - give gifts of a nominal value (such as BF advertising novelties);
 - with management approval, provide meals and other entertainment to be at a reasonable level.

For the avoidance of doubt, the per capita cost of a meal should not exceed £50 and would normally be much less;

5.7 Receiving gifts and hospitality

- Colleagues or any member of their family should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.
- Gifts or hospitality may not be accepted, irrespective of value, which might influence or be seen to influence relationships or organisations, or to benefit personally or for the benefit of any person connected to that person.
- Unless you have been informed otherwise you may accept:
 - a gift of nominal value, such as an advertising novelty, 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.
 - **For the avoidance of doubt:**
 - gifts with a value of more than £25 and hospitality expected to cost in excess of £50 should be authorised by your line manager;
 - gifts or hospitality in excess of £100 should be authorised by the Chairman;
 - hospitality or gifts in excess of £500 should be authorised by the Board of The Sabre Trust.

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5.8 If an excessive gift or hospitality is found to have been accepted, then a TST Trustee 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 BF policy (or potentially illegally), then appropriate disciplinary procedures will be followed.

6. FACILITATION PAYMENTS AND KICKBACKS

6.1 The Sabre Trust does not and will not accept facilitation payments or kickbacks of any kind.

6.2 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by a third party.

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

6.4 All Colleagues must avoid any activity that might lead to, or suggest that a facilitation payment or kickback will be made or accepted by The Sabre Trust.

7. DONATIONS

7.1 The Sabre Trust does not make contributions of any kind to political parties.

7.2 The Sabre Trust does not make any charitable donations for the purpose of gaining any commercial or business advantage.

8. RECORD KEEPING

8.1 The Sabre Trust will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

8.2 All expense claims relating to hospitality, gifts or expenses incurred to, with or from third parties must be submitted in accordance with The Sabre Trust's Financial Procedures and specifically record the reason for the expenditure.

8.3 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts are to be kept "off-book" to facilitate or conceal improper payments.

9. RAISING CONCERNS

9.1 All Colleagues are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

9.2 No Colleague will suffer any detriment as a result of raising a genuine concern about bribery, even if such concern turns out to be mistaken.

10. NON-COMPLIANCE

10.1 In addition to the potential consequences under the Bribery Act 2010, failure to observe this policy by a Colleague may lead to disciplinary action in accordance with the appropriate disciplinary policy of The Sabre Trust.

10.2 In the event of a breach of this policy by someone who is not subject to disciplinary proceedings within The Sabre Trust, The Sabre Trust will take such action as it deems appropriate in the circumstances

11. MONITORING

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11.1 The effectiveness of this policy will be regularly reviewed by the Board of The Sabre Trust.

11.2 Internal control systems and procedures will be subject to audit under the internal audit process

12. POLICY REVIEW

This policy will be reviewed annually. Next review date: March 2021