



# **Anti-Bribery and Corruption Policy**

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## **1. Introduction**

- 1.1. LRHA is committed to the highest standards of ethical conduct and integrity in its business activities. This policy seeks to prevent and prohibit bribery, in accordance with the Bribery Act 2010. LRHA will not tolerate any form of bribery by, or of, its Staff, Board and/or Committee members, its temporary workers, contractors, agents, consultants or any person or body acting for or on LRHA's behalf (known as "associated persons"). LRHA is committed to implementing effective measures to prevent, monitor and eliminate bribery.

## **2. Aims and Objectives of the Policy**

- 2.1. This policy sets out the procedures in place to prevent and prohibit bribery in accordance with the Bribery Act 2010.

## **3. What is bribery?**

- 3.1 A bribe is an inducement or reward offered, promised or provided in order to improperly gain any commercial, contractual, regulatory or personal advantage, which may constitute an offence under the Bribery Act 2010, namely:
- 3.1.1 Giving or offering a bribe.
  - 3.1.2 Receiving or requesting a bribe.
  - 3.1.3 Bribing a foreign public official.
- 3.2 LRHA may also be liable under the Act if it fails to prevent bribery by an associated person for the Association's benefit.

## **4. Gifts and Hospitality**

- 4.1 This policy does not prohibit normal and appropriate gifts and hospitality (given or received) to or from third parties unless otherwise specifically stated. However, LRHA has internal policies and procedures which provide guidance as to what is to be regarded as normal and appropriate in terms of financial limits, subject to the principles set out below, namely that any gift or hospitality:
- 4.1.1 Must not be made with the intention of improperly influencing a Third Party or employee to obtain or retain business or a business advantage, or to reward the provision or retention of business or business advantage, or in explicit exchange for favours or benefits;
  - 4.1.2 Must comply with local law in all relevant countries;
  - 4.1.3 Must be given in the name of the organisation, not in an individual's name;
  - 4.1.4 Must not include cash or a cash equivalent;
  - 4.1.5 Must be appropriate in the circumstances;
  - 4.1.6 Must be of an appropriate type and value and given at an appropriate time taking into account the reason for the gift;
  - 4.1.7 Must be given openly, not secretly; and
  - 4.1.8 In the case of gifts, they must not be offered to, or accepted from, government officials or representatives, politicians or political parties, without prior approval.

## 4.2 **What is not acceptable?**

4.3 It is not acceptable to:

- 4.3.1 Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that it will improperly give a business advantage, or as a reward for a business advantage already improperly given;
- 4.3.2 Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent, or representative to facilitate or expedite a routine procedure;
- 4.3.3 Accept payment from a Third Party where it is known or suspected that it is offered or given with the expectation that the Third Party will improperly obtain a business advantage;
- 4.3.4 Accept a gift or hospitality from a Third Party where it is known or suspected that it is offered or provided with an expectation that a business advantage will be improperly provided by LRHA in return;
- 4.3.5 Threaten or retaliate against another person who has refused to commit a bribery offence or who has raised concerns under this policy; or
- 4.3.6 Engage in any activity that might lead to a breach of this policy.

## 4.4 **Charitable Donation**

4.5. LRHA only makes charitable donations that are legal and ethical and which are in accordance with LRHA's internal policies and procedures.

## 4.6. **Record Keeping**

4.7. Staff, and where applicable associated persons, are required to take particular care to ensure that all of LRHA's records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials.

4.8. Staff and associated persons are required to keep accurate, detailed, and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered in accordance with LRHA's Gifts and Hospitality Policies for employees, Board and Committee members respectively. All such declarations will be entered into a Gifts and Hospitality Register.

## 4.9. **Reporting Suspected Bribery**

4.10. LRHA depends on its Staff, Board and/or Committee members and associated persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Staff, Board and/or Committee members and associated persons are requested to assist LRHA and to remain vigilant in preventing, detecting and reporting bribery.

4.11. Staff, Board and/or Committee members and associated persons are encouraged to report any concerns that they may have as soon as possible. Concern can be raised to a member of the Leadership Team or the Audit & Risk Committee Chair. Issues that should be reported include:

4.11.1 Any suspected or actual attempts at bribery;

4.11.2 Concerns that other employees, Board and/or Committee members or associated persons may be being bribed; or

4.11.3 Concerns that other employees, Board and/or Committee members or associated persons may be bribing third parties, such as clients or government officials.

#### **4.12. Dealing with Breaches**

4.13. The Board will treat any breach of this Policy with maximum seriousness. Any Member of Staff who breaches this policy will face disciplinary actions, which could result in dismissal for gross misconduct. Any Board or Committee Member will be dismissed from their post, if a breach is discovered and proved. If a breach is discovered, LRHA will consider whether the severity of discovery warrants full disclosure to the Police, Regulator and the Serious Fraud Office.

### **5. Equality and Diversity Implications**

5.1 We are committed to fairness and equality for all regardless of their colour, race, ethnicity, nationality, gender, sexual orientation, marital status, disability, age, religion or belief, family circumstances or offending history. Our aim is to ensure that our policies and procedures do not create an unfair disadvantage for anyone, either directly or indirectly.

5.2 We will comply with the Equality Act 2010 and will adapt our process or make reasonable adjustments to accommodate an individual's needs wherever possible and reasonable.

### **6. Monitoring and Review**

6.1 This policy will be reviewed every 3 years. A review may be conducted earlier if there are significant changes to either legislation or LRHA's operating practices.

### **7. Associated Documents / Policies**

7.1. This policy should be read in conjunction with:

7.1.1 Fraud Risk Management Policy

7.1.2 Code of Conduct 2022

7.1.3 Whistleblowing Policy

7.1.4 Financial Regulations

7.1.5 Procurement Policy

7.2 Copies of these policies are available on SharePoint and will also be covered as part of the induction process of both new staff and Board Members, where appropriate.

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