



1.0 Introduction and Purpose

Scottish Rowing is committed to honesty and integrity in how it does business and is committed to implementing and enforcing effective systems to counter bribery. It is the Company'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 Scottish Rowing and its members, including anyone providing services to the Company such as coaches or contractors.

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

1.1 Explanation of the Bribery Act

There are four main offences:

1. Two general offences:
 - a. Giving or offering a bribe – active bribery
 - b. Requesting or accepting a bribe – passive bribery
2. A specific offence – bribing a foreign public official
3. A corporate offence – negligently failing to prevent bribery.

The act also makes facilitation payments illegal.

Gifts and hospitality have to be considered carefully to ensure that they are proportionate and not extraordinary i.e. is the event to develop a relationship or to seek advantage or undue influence especially but not exclusively where foreign officials are involved.

Approved	12/9/17
Reviewed	

2.0 Policy Statement

All Directors, employees and those with appointed roles (voluntary and paid who have been appointed to act on behalf of Scottish Rowing) are required to comply with this policy.

2.1 Scottish Rowing will not:

- Make contributions of any kind with the purpose of gaining any commercial advantage.
- 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.
- Make, or accept, “kickbacks” of any kind.

2.2 Scottish Rowing will:

- Keep appropriate internal records that will evidence the business reason for making any payments to third parties.
- Encourage employees to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- See that anyone raising a concern about bribery will not suffer any detriment as a result, even if they turn out to be mistaken
- Keep a record of all gifts or hospitality received in compliance with the Code of Conduct

2.3 Employees must not:

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

This policy does not prohibit giving and receiving promotional gifts of low value, or normal and appropriate hospitality.

Facilitation Payments policy

Scottish Rowing prohibits ‘facilitation’ payments as these are bribes and are therefore illegal. In addition, the Bribery Act 2010 has a specific offence to bribe a public official. It is also our policy that we work to ensure that any intermediaries, joint ventures, contractors, suppliers and any other third party we do business with do not make facilitation payments on our behalf. If you have doubts about a payment and systems that might be considered as a facilitation payment, only make the payment if the official or third party can provide a formal receipt or written confirmation of its legality. If practicable, obtain line manager advice and approval. If the demand is accompanied by immediate threat of physical harm then put safety first, make the

payment and then report immediately to the Line Manager the circumstances and amount of the payment.

Receiving gifts:

Any gift offered to any employee (including Board Members/Directors/appointed role holders) which may influence their judgement towards the donor must be refused. Receiving promotional gifts of low value is normal and appropriate, however, gifts with a value exceeding £25.00 may not be accepted without line manager approval. Any gift offered and then refused because of its value, must be reported to the Scottish Rowing Office.

Offering gifts:

Business gifts are primarily aimed at thanking customers and suppliers for their custom and loyalty, only authorised gifts may be given.

Receiving Hospitality:

The acceptance of corporate hospitality must be transparent; all invitations must be reported to the company before an employee accepts any invitation. The following areas are exempt while attending conferences, seminars, sponsored by third parties.

- business and travel expenses incurred
- normal business lunches and meals

Offering gifts and hospitality:

Company hospitality is primarily aimed at thanking customers and suppliers for their custom and loyalty. All hospitality events must have approval.

Donations to organisations:

No donations should be made to charities, political parties or other organisations without approval.

Attempts to bribe

Any employee who is concerned that he or she is potentially being bribed should report this matter to his or her head of department immediately

Raising concerns

If an employee is concerned that acts of bribery are occurring in the organisation they should inform their line manager in the first instance. If this course of action is inappropriate, the employee should inform the COO.

Non-compliance

Under UK law bribery is a criminal offence (no matter where in the world the corrupt behaviour takes place), as are attempts, aiding and abetting or conspiracy to commit such an offence. The penalties on conviction are likely to be severe, and include:

1. Long terms of imprisonment for individuals;
2. Significant fines;

3. Debarment from public procurement projects; and/or
4. Lasting reputational damage for the company.

Scottish Rowing is committed to complying with all applicable laws everywhere it conducts business. As a result, all officers, employees and representatives have an affirmative obligation to become familiar with, and to adhere to, this Policy.

Any action in breach of this Policy may constitute gross misconduct and as such would be likely to lead to dismissal. The policy will be monitored on an on-going basis to ensure that it addresses issues effectively.

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.

Facilitation Payments

Facilitation payments are small payments usually made to public officials to secure or speed up routine actions, such as issuing permit, immigration control, providing services or releasing goods held in customs.

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

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Company senior management to see that all relevant employees receive notice. Written notice and/or training should be considered.

The following will be monitored:

- That all individuals working for Scottish Rowing are advised of the policy
- Assessment of any reported incident or related occurrence