



# CRIEFF ARCHERY CLUB

## Code of Conduct Anti-Bribery

Responsible for review of document	Chairperson of Crieff Archery Club
	Crieff Archery Club Committee

Crieff Archery Club will follow the Codes of Conduct laid down by Archery GB.

Should the Archery GB document be past its review date, the document will remain current until updated.



## Code of Conduct

### Anti-Bribery

<b>Responsible for review of policy</b>	<b>Responsible for review of procedures</b>
Chairman of Audit & Risk	Head of Finance

Change History				
Version	Sections approved	By	Date of approval	Next review date
OPP-06e-02	Policy & Procedures	Board	March 2017	June 2023

## **Policy**

Archery GB has a zero-tolerance attitude to Bribery and will conduct all of its business in accordance with the Bribery Act 2010. All activities will be carried out in an honest and ethical manner and will apply to both employed and voluntary personnel when representing Archery GB.

The penalties for committing a crime under the Act are a maximum of 10 years' imprisonment, along with an unlimited fine, and the potential for the confiscation of property under the Proceeds of Crime Act 2002, as well as the disqualification of directors under the Company Directors Disqualification Act 1986.

Archery GB are committed to implementing effective systems and procedures and enforcing them to counter bribery.

## Procedures

### Scope of the Policy

#### This Policy applies to:

- All personnel whether full time, part time or temporary;
- All Voluntary personnel who have a position of authority within Archery GB;
- Any consultants doing commissioned work for Archery GB;
- Any contractors undertaking work for Archery GB; or
- Any other person providing services to Archery GB

For the purposes of this document the term 'colleagues' will include the above.

### What is a Bribe

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

- To or from any person to persuade them to/or reward them for performing their duties improperly;
- To or from any public official with the intention of influencing that or other official in performing their duties; or
- To or from World Archery or any member county of World Archery with the intention of influencing that or other official in performing their duties.

### Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value to a maximum of £50 sterling and normal and appropriate hospitality. To ensure openness & transparency all hospitality & entertainment offered / received must be recorded in the hospitality & entertainment register maintained by the CEO.

We will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence an official in the performance of his/her duties.

### Facilitation payments and kickbacks

We do not make and will not accept facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by any official. Kickbacks are typically payments made in return for a business favour or advantage. All colleagues must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

### Donations

We do not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

### Record Keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

## Anti-Bribery Policy

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our financial procedures manual and specifically record the reason for the expenditure.

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 must be kept “off-book” to facilitate or conceal improper payments.

### **Raising Concerns**

All colleagues will be encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. No person will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.

Concerns should be reported to the Chief Executive in the first instance. Should the concern include the Chief Executive, then the matter should be reported to the Chairman of the Board. Should the concern include the Chairman, then the matter should be reported to the Company Secretary for bringing to the attention of the Board.

### **Non-Compliance**

Failure for colleagues to observe this policy may lead to disciplinary action in accordance with the appropriate disciplinary policy of Archery GB

Where an individual / organisation is not subject to disciplinary procedures within Archery GB, Archery GB will seek legal advice and take appropriate action.

### **Monitoring**

The effectiveness of this policy will be annually reviewed by the Board of Archery GB. Internal control systems & procedures will be subject to audit.