

**THE SAM & BELLA SEBBA CHARITABLE TRUST
ANTI-BRIBERY POLICY**

POLICY STATEMENT

1. This policy has been created to comply with the requirements of The Bribery Act 2010.
2. The Sam and Bella Sebba Charitable Trust (SBSCT) has a zero-tolerance to bribery and corruption. This policy extends to all the Trust's dealings and transactions and these both have a wide interpretation across all functions.
3. The policy is given force in an anti-bribery programme which is regularly monitored and reviewed to capture changes in law, reputation, demands and changes in our business.
4. The Senior Responsible Officer within SBSCT is the Chief Executive.

WHO IS COVERED BY THIS POLICY?

5. All Trustees, staff and consultants and Business Relationships.

WHAT IS BRIBERY?

6. The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal or a breach of trust.

WHAT IS CORRUPTION?

7. The abuse of entrusted power for private gain or advantage. It hurts everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority.

HOW WILL THE POLICY BE IMPLEMENTED?

8. The Policy will be implemented by:
 - An anti-bribery programme which will be actively managed and communicated to all our staff, to ensure that the policy is fully and consistently delivered in all our business dealings and

transactions across all functions.

- The visible commitment of the Board of Trustees leading to the encouragement of the full participation of all Staff, Trustees, grantees, and all our business relationships.
- The Finance Committee of the SBSCT will monitor and review the events that could give rise to bribery, the risk exposure to these events and the adequacy of the risk treatments in place.

This will include reporting to the Trustees.

- Internal control issues including those identified by Internal and External Audit on implementing the policy and programme and the results of risk assessments will be regularly reported to the Audit & Risk Committee.

WHAT SPECIFIC CONTROLS ARE IN PLACE?

9. There are three specific areas that can often be used as a subterfuge for bribery. We prevent this happening by:

- **Political contributions** - We do not make political contributions under any circumstances. A political contribution is any contributions made in cash or kind to support a political party, whether directly or indirectly.
- **Facilitation Payments** – We do not make facilitation payments under any circumstances. These are small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.
- **Gifts and hospitality** – Trustees, staff and consultants may not accept or make gifts to providers, grantees or applications. Minor hospitality such as a cup of tea or coffee or attendance at a fundraising event of a grantee or potential grantee are permitted.

HOW WILL WE COMMUNICATE THE RESULTS OF IMPLEMENTING THE POLICY?

10. We will report in our Annual Report & Accounts on our progress in implementing the programme.

WHAT IS EXPECTED OF THE PEOPLE COVERED BY THIS POLICY?

11. All Trustees, staff and consultants will be required to:

- Understand how the policy and programme impact on themselves and their job.
- Attend any training or other events designed to communicate the policy and the programme.
- Comply with the policy and the anti-bribery programme at all times
- Re-sign the policy each year as evidence of their continued understanding of the policy, the programme and the impact on themselves and their own job.
- Seek advice if unclear or unsure of any aspect of this policy and programme.

12. All Business relationships will be required to:

- Understand how the policy and programme impact on themselves and their relationship.
- Comply with the policy and the anti-bribery programme at all times
Sign the policy as evidence of their continued understanding of the policy, the programme and the impact on themselves and their own relationship. This will be part of the contract terms for Suppliers or in documentation appropriate to the relationship.
- Seek advice if unclear or unsure of any aspect of this policy and programme.

13. Reporting of any act of bribery identified or suspected, in confidence, using the contacts and procedures contained within our Whistle Blowing Policy.

WHAT ARE THE PENALTIES OF BREACHING THIS POLICY?

- 14.** The Bribery Act 2010 makes provision for individual and corporate responsibility with imprisonment for up to 10 years and unlimited fines depending upon the nature of the offence for individuals and corporate fines that may be unlimited.
- 15.** Trustees and Staff will be subject to our disciplinary procedures which could result in resignation or dismissal. There is also the possibility that criminal and or civil legal action will be taken.
- 16.** Those acting in a Business Relationship (including Agents, Suppliers and Contractors) with SBSCT will have their business relationship terminated, the matter will be reported to the appropriate authorities and there is the possibility of criminal and or civil legal action.

Last updated

November 2018