



**British  
Elite  
Athletes  
Association**

# **BRIBERY, GIFTS AND HOSPITALITY POLICY**

[www.britisheliteathletes.org](http://www.britisheliteathletes.org)

**With you.**



## **Bribery, Gifts and Hospitality Policy**

The British Elite Athletes Association is committed to conducting all business in an ethical and honest manner, acting professionally, fairly and with integrity in all business dealings and relationships.

All employees, Board members, volunteers and appointed individuals will uphold the spirit of this policy and will not do any act or thing nor omit to do any act or thing for the benefit of, in the name of or on behalf of the company that could cause us to be in breach of this policy or could be construed as an offence under any applicable anti-corruption legislation, including but not limited to the UK Bribery Act. Any person who breaches this policy will face disciplinary action, which may result in dismissal.

### **Bribery**

The UK Bribery Act defines a bribe as any financial or other advantage offered, promised, given, requested, and agreed to being received or accepted in order to encourage or reward improper activities. A bribe could therefore cover gifts and hospitality offered, promised, given, requested, agreed to being received or accepted with a view to winning work or influencing decisions. Bribery and corruption are punishable for individuals by up to ten years' imprisonment and would have severe consequences for the reputation and business transactions of the company.

### **Gifts and Hospitality**


This policy does not prohibit normal and appropriate gifts and/or hospitality given or received to or from third parties. Seasonal or other gifts and/or hospitality of insignificant value (£100 or less) are acceptable.

The level of hospitality offered, the way in which it was provided and the level of influence the person receiving it has on the company must be proportionate and reasonable. Therefore giving or receiving tickets to sporting events or taking clients to dinner is not in contravention of the Bribery Act if that is reasonable and proportionate in the circumstances.

However, any gift and/or hospitality from any person, firm or company or other organisation with whom the Company has, or may wish in the future to have, a business relationship, or from any representative of any such person, firm, company or organisation should not be accepted or requested, without the agreement of the Chief Executive.

Where a gift or offer of hospitality arrives unexpectedly and its value is estimated to be more than £100 it should be declared in writing to the Chief Executive who will decide on the action to be taken (e.g. kept, returned, donated to charity etc.).





Likewise, gifts or hospitality should not be offered, promised or given to any person, firm or company or other organisation with whom the Company has, or may wish in the future to have, a business relationship, or to any representative of any such person, firm, company or organisation, without the agreement of their Chief Executive.

### **Record-keeping**

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

Individuals must declare and keep a written record of all hospitality or gifts accepted or offered.

### **How to raise a concern**

An individual is encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If an individual is unsure as to whether a particular act constitutes bribery or corruption then this query should be raised with the Chief Executive. The concern should be raised as soon as possible if an individual believes or suspects that a conflict of this policy has occurred, or may occur in the future.


Concerns should be reported by following the procedure set out in the whistleblowing policy.

### **What to do if an individual is a victim of bribery or corruption**

It is important that an individual informs the Chief Executive immediately if they are offered a bribe by a third party, are asked to make one, suspect that this may happen in future, or believe that they are a victim of another form of unlawful activity.

### **Protection**

Individuals who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are encouraged to come forward and will be supported by the company where concerns are raised in good faith under this policy, even if they turn out to be mistaken.





Last review (date)	March 2023
Reviewed by (name)	Board
Next review and approval due (date)	March 2025

