

Anti Bribery and Corruption Policy



1. Introduction

This policy outlines the Triathlon Scotland policy in order to comply with the laws with regard to bribery and corruption. The new Bribery Act 2011 came into force on 1 July 2011. The basic principles of this policy are in line with Triathlon Scotland's core values:

- Promote fair play
- Encourage respect
- Develop consistency and transparency
- Embrace change
- Encourage high aspirations
- Celebrate success
- Be environmentally conscious

It is important that every person within the organisation makes ethical business decisions and ensures that his or her actions are consistent with the law and the Triathlon Scotland Policy. This means understanding the policy and the principles it represents. It also means that when a question or problem occurs, people respond with care rather than ignoring the issue or simply guessing. It also means reporting concerns and making sure that suspect behaviour does not go unchallenged.

2. Explanation of the Bribery Act

There are four main offences:

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

The act also makes facilitation payments illegal. 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.

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.

3. Bribery and Corruption Policies

The Triathlon Scotland policy has a zero tolerance of bribery or corruption. This policy extends to all the company's business dealings and transactions. All Directors, employees and those with appointed roles (voluntary and paid who have been appointed to act on behalf of Triathlon Scotland) are required to comply with this policy.

a. Facilitation Payments Policy

Triathlon Scotland prohibits 'facilitation' payments as these are bribes and are therefore illegal. In addition, the Bribery Act 2011 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.

b. Gifts and Hospitality

Any gift offered to any employee (including Board Members/Directors/appointed role holders), which may influence their judgement towards the donor, must be refused. Gifts that Triathlon Scotland may offer to third parties must also be reviewed.

Examples of gifts may be:

- A weekend away
- An expensive bottle of wine or spirits
- Attendance at sporting events or concerts

Any corporate gift values at £50 or more (High Value Gift) must be notified wherever possible in advance to the Line Manager. In any event, all gifts and hospitalities (regardless of value) both given and received should be recorded via the Chief Executive Officer to the Executive Board.

4. To whom does the Bribery Act apply

The Bribery Act 2011 applies to all employees' (including Directors and appointed roles) and associated persons. An associated person is persons or bodies acting on behalf of the company such as suppliers, customers, service providers, agents, joint ventures.

5. Duty of Each Employee

The duty of all directors and each employee is to comply with the Bribery Act 2011, failure to do so would be considered Gross Misconduct. The penalty for Gross Misconduct offences can be up to and including dismissal.

6. Questions

Should any Board Member or employee have any questions with regard to the Bribery Act, they should contact the Chief Executive Officer.

7. Review

This policy will be reviewed every two years. The next review date will be January 2020.

8. Endorsement

This policy was reviewed by the Triathlon Scotland Executive Board in January 2018.