

ANTI-BRIBERY AND CORRUPTION POLICY

This document sets out the rules of Sand Dams Worldwide (“The Company”) in relation to anti-bribery and corruption matters.

Policy Statement

Sand Dams Worldwide values its reputation for ethical behaviour and for financial probity and reliability. It recognises that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Sand Dams Worldwide expects that all those who work for and with the organisation will adopt the highest standards of propriety and accountability. Sand Dams Worldwide has a zero tolerance to fraud, bribery and corruption and is committed to detecting and preventing any such actions. All reported or identified instances will be dealt with in a professional and timely manner.

The aim of this policy therefore is to limit exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees, trustees and volunteers so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees, trustees and volunteers to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately;
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;
- Taking firm and vigorous action against any individual(s) involved in bribery.

Application of the Policy

The UK anti-bribery and corruption legislation applies to all activities of a UK-based Charity / business no matter where they are carried out in the world. This policy therefore applies to ALL activities worldwide, whatever the local law, practice or custom may be.

Scope of Policy

No bribes of any sort may be paid to or accepted by employees, trustees or volunteers of Sand Dams Worldwide (hereby referred to as “Sand Dams Worldwide team members”); overseas charitable partners, donors, customers, suppliers, sponsors, politicians, government advisors, representatives, intermediaries, consultants or any other people or bodies associated with Sand Dams Worldwide.

Definitions

Bribery is the offer or receipt of any gift, loan, payment, reward or other advantage to or from any person as an encouragement to do something, which is dishonest, illegal, or a breach of trust, in the conduct of the Company’s business.

Facilitation payments is the offer of money to any public officials in order to speed up service or gain improper advantage. This type of bribery is a ‘facilitation payment’ and is illegal. If you are faced with a demand for a facilitation payment, you must:

- Actively resist the payment
- Inform the Chief Operating Officer or any Trustee of the Board.

Corruption is the misuse of entrusted power for private gain.

To place this in context, you should be aware that if individuals engage in activities, which are contrary to UK anti-bribery and corruption legislation, they could face up to 10 years in prison and/or an unlimited fine, and Sand Dams Worldwide could be liable to an unlimited fine and Government sanction.

Gifts and Hospitality

Sand Dams Worldwide team members are expected to act with integrity and impartiality and to be guided by the following rules when accepting or receiving gifts, hospitality and entertainment. In addition, employees of Sand Dams Worldwide charitable partners that are based in the UK or overseas are required to follow these standards.

In order to protect Sand Dams Worldwide team members as well as the reputation of Sand Dams Worldwide from accusations of bribery or corruption, employees, trustees and volunteers are not permitted to directly or indirectly, give or receive money, gifts, hospitality, rewards or other benefits from any source. This includes suppliers, donors, other employees and members of the public with which he/she comes into contact or maintains contact because of the duties for which they are employed by, or provide a role within, Sand Dams Worldwide.

Exceptions:

1. Personal Gifts

Sand Dams Worldwide team members may accept gifts of nominal value (under £15) such as branded pen, T-shirt, stationery and mouse mats that have been produced by a supplier or donor and is customarily offered to others that have a similar relationship with the supplier or donor. Sand Dams Worldwide recognises that there may be exceptional circumstances when refusing a gift may cause offence or embarrassment. In such instances, the gift should be accepted, registered and donated to Sand Dams Worldwide.

2. Donor Hospitality and/or Entertainment

Sand Dams Worldwide team members may occasionally receive invitations from donors for hospitality or entertainment that may be accepted if:

- The entertainment and acceptance thereof is not perceived as a reward or inducement for preferential treatment by Sand Dams Worldwide
- The entertainment is part of an event to raise funds or build relationships with a donor or their associates i.e. a hosted business context
- Meals and overnight accommodation should only be provided where these are reasonable and in the normal course of Sand Dams Worldwide business activities.

These in all circumstances should be pre-approved by a member of the Senior Management Team or a Trustee, and be recorded in the Hospitality and Gift register.

3. Hospitality (food and/or drink)

Meals or drink may be accepted from donors or charitable partners providing the expenses are kept to a reasonable level. Hospitality expected to cost in excess of £50 should be authorised

by a member of the Senior Management Team or the Chairman. Meals or drink may NOT be accepted from suppliers unless the employee, volunteer or trustee of Sand Dams Worldwide PERSONALLY provides meals or drink to a similar value.

Hospitality and Gifts Register

An accurate record must be kept of all hospitality and entertainment offered by Sand Dams Worldwide team members. Gifts offered to Sand Dams Worldwide must also be recorded as soon as is reasonably practicable and the record should detail the following:

- A description of the gift, hospitality or entertainment offered
- An estimation of the value of the hospitality or entertainment
- Whether it was rejected or accepted
- From whom prior approval was sought

The register will be owned by the Chief Operating Officer and reviewed as appropriate by the Senior Management Team and the Board.

You should at all times act in accordance with the following provisions:

- Behave honestly, be trustworthy and set a good example
- Use the resources of Sand Dams Worldwide in the best interests of the Charity
- Make a clear distinction between the interests of the Charity and your private interests to avoid any conflict of those interests.
- Ensure that any community support, sponsorship and charitable donations do not constitute bribery
- Confidentially report all incidents, risks and issues which are contrary to this policy document
- Raise any issues regarding anti-bribery and corruption laws via the Company's policies and processes. Queries will be dealt with confidentially and a written response will be issued
- Do not offer or accept bribes

The Bribery Compliance Officer (Chief Operating Officer) should be responsible for:

- Conducting periodic risk assessments as to the organisation's exposure as to bribery and corruption risk - in particular with charitable partners
- Providing training for staff on anti-bribery procedures and measures
- Ensuring that all charitable partners sign up to Sand Dams Worldwide's Charitable Partner Anti-Bribery Policy and that compliance is audited in line with the risk assessment
- Maintaining accurate records of all disclosures made to him/her in respect of identified bribery and corruption risk
- Reviewing the entries on the Hospitality and Gifts register
- Considering the efficacy of appropriate disclosure to regulatory authorities
- Incorporating the anti-bribery measures as effective internal controls within the organisation
- Conducting heightened due diligence in respect of bribery risk, where a report is made to him/her or where risk assessments indicate that there is a heightened bribery risk
- Updating the policy and procedures as further documentation and guidance becomes available

Sand Dams Worldwide team members

The prevention, detection and reporting of bribery is the responsibility of all employees. You have a duty to act if you believe there is a possibility of fraud, bribery, corruption or poor value for money taking place or that rules are being breached.

Inevitably, decisions as to what is acceptable may not always be easy. If you are in doubt as to whether a potential act constitutes bribery, the matter should be referred to the Chief Operating Officer. Appendix 1 sets out some examples of potential fraud and bribery indicators.

Suitable channels of communication by which Sand Dams Worldwide team members or others can report confidentially any suspicion of bribery will be maintained via the whistleblower's policy.

Compliance with the Sand Dams Worldwide policy in relation to bribery and corruption is regarded as part of your contract of employment. If you fail for any reason to follow the rules set out in the document this may result in disciplinary action being taken against you, which could result in your dismissal.

How to raise a concern

Concerns should be reported to a member of the Senior Management Team or Chairman of the Board depending on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the allegation is about third parties, colleagues or management then concerns should be directed to the senior Chief Operating Officer, (who is also the Monitoring Officer). Complaints against the Chief Operating Officer should be passed to the Chairman.

Concerns may be raised verbally or in writing. Staff wishing to make a written report should mention the following:

- The background and history of the concern (giving relevant dates);
- The reason for the concern

Staff should report the concern at the earliest opportunity so that action can be taken. Although staff are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for concern.

The Chairman will decide whether a full investigation is required or whether it is best dealt with as a management issue. If an investigation is required they will appoint an investigating officer.

Investigation

If an investigation is appropriate, the investigating officer should follow the process as set out in the whistleblowing policy. Key steps include:

- Full details and clarification of the complaint/concern should be obtained
- In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take

- Within 10 days they will acknowledge to the complainant that the complaint has been received; indicate how it is proposed to deal with the matter and inform them whether further investigations will take place and if not, why not. They will also be informed of any action taken as far as the relevant process and/or law will allow.
- If the complaint is against a member of staff, they should be informed as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- If there is evidence of criminal activity then the investigating officer should inform the police. Sand Dams Worldwide will ensure that any internal investigation does not hinder a formal police investigation.
- Consult with the Chief Operating Officer or Chair of the Board of Trustees to consider the involvement of the Governance and Risk committee, auditors and the Police as appropriate.

Who to Contact

Inevitably, decisions as to what is acceptable may not always be easy. If anyone is in doubt as to whether a potential act constitutes bribery, they should seek clarification.

For further information and clarification, please contact Chief Operating Officer
UK phone Number: 07596 225 677 or email: judith@sanddamsworldwide.org.uk
If you still require clarity, you can contact the Treasurer. Email:
sarah.field@sanddamsworldwide.org.uk

By complying with this policy document we aim to ensure that you and the Sand Dams Worldwide team members will not at any time knowingly breach any relevant anti-bribery and corruption legislation and also that by adhering to the Policy that Sand Dams Worldwide can demonstrate that it has adequate procedures in place to prevent such activity.

Appendix 1 Fraud Indicators

There are several common indicators or red flags for bribery and fraud:

Buying unnecessary or inappropriate goods. If an employee purchases unnecessary or inappropriate items from a supplier or contractor with no obvious business need, this could be an indication of a potentially corrupt relationship. Watch out for frequent low-level orders or purchases of large quantities, particularly if there is no visible need for such items or those goods never seem to materialise.

Questionable invoices. Corrupt payments and bribes may be concealed in invoices. For example, invoices may be submitted without any actual work being done and with no supporting documentation. Invoices may also conceal corrupt payments, which appear as extra fees, expenses or charges. Look out for over-inflated invoices or invoices that cannot be matched to any discernible output. Do all fees, commissions or expenses have supporting documentation?

Continued acceptance of poorer quality. If an employee continues to work with or accept sub-standard goods or services despite complaints being made, this could be a strong indicator for possible corruption, a possible kickback from the supplier or contractor for continued business

Conflicts of interest: The risk of bribery and corruption can increase where there are close connections or links between an employee and a supplier or contractor. Do any employees have a personal or economic interest in a particular transaction or appointment? Are there close links or personal relationships? Does their behaviour change when certain suppliers are mentioned? Are they acting differently or suspiciously? Is there an insistence that they alone deal with a certain supplier? All this could indicate a conflict of interest

Unqualified third parties: Bribery and corruption can occur via intermediaries and agents, who may appear to do no more than facilitate the deal. Be suspicious if any third party your company is dealing with seems; unqualified for the job they are contracted to perform. If they have no track record in the industry in which they operate, if they lack facilities or resources required to perform the work, if they come highly recommended by a foreign public official and seem able to bypass legal or bureaucratic hurdles effortlessly.

Incomplete travel and expenses: Bribes and corrupt payments may be concealed as travel expenses or hospitality. Expenses should only be reimbursed for legitimate business expenditure, backed up with supporting documentation. Look out for travel and expense forms with missing receipts or that do not add up – e.g. a reported trip to a supplier's site that simply did not happen. This could be a sign of something bigger - of internal fraud or business money being used for improper payments.