

ANTI-BRIBERY AND CORRUPTION POLICY

This document sets out the rules of Excellent Development ("The Company") in relation to anti-bribery and corruption matters.

Excellent 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.

Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees and trustees so that they can recognise and avoid the use of bribery by themselves and others;
- Encouraging its employees and trustees 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 Excellent Development (hereby referred to as "Excellent team members"); overseas charitable partners, donors, customers, suppliers, sponsors, politicians, government advisors, representatives, intermediaries, consultants or any other people or bodies associated with Excellent Development.

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 Do not offer 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 Head of Finance 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 Excellent as an organisation could also be liable to an unlimited fine and Government sanction.

Gifts and Hospitality

Excellent 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 Excellent Development charitable partners that are based in the UK or overseas are required to follow these standards.

In order to protect Excellent team members as well as the reputation of Excellent Development from accusations of bribery or corruption, employees, volunteers and trustees 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 by reason of the duties for which they are employed by, or provide a role within, Excellent Development.

Exceptions:**1. Personal Gifts**

Excellent 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. Excellent Development 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 Excellent Development.

2. Donor Hospitality and/or Entertainment

Excellent Development 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 Excellent Development

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 Excellent Development business activities.

These in all circumstances should be pre-approved by a member of the SMT 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 Excellent Development 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 Excellent team members

Gifts offered to Excellent Development 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 Head of Finance 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 Excellent Development 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 (Head of Finance) should be responsible for:

- Conducting periodic risk assessments as to the organisations 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 Excellent Development'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

Excellent team members The prevention, detection and reporting of bribery is the responsibility of all employees. Suitable channels of communication by which Excellent team members or others can report confidentially any suspicion of bribery will be maintained via the whistleblower's policy. Compliance with the Excellent 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 this document this may result in disciplinary action being taken against you which could result in your dismissal.

Who to Contact

For further information and further clarification please contact Head of Finance.

UK phone Number: 020 3752 5780; email: finance@excellent.org.uk

If you still require clarity, you can contact the Treasurer. Email: Nigel@excellent.org.uk

By complying with this policy document we aim to ensure that you and the Excellent 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 Excellent Development can demonstrate that it has adequate procedures in place to prevent such activity.

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, the matter should be referred to the Head of Finance.

I confirm that I have received and read this document and had any questions related to it answered to my satisfaction.

.....
Print Name

Role: Employee

Volunteer

Trustee (Please circle)

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Signed