



Anti-Bribery Policy

Responsible Person	Directors
This version Date	May 2022
Review Date	May 2023
Review by	SP

CM Sports and CM Foundation expects all Staff and volunteers to act honestly and with integrity at all times and to safeguard the public resources for which they are responsible. CM Sports will not accept any level of fraud or corruption; consequently, any case will be thoroughly investigated and dealt with appropriately. CM Sports is committed to ensuring that opportunities for fraud and corruption are reduced to the lowest possible level of risk.

Legal Obligations

This anti-bribery policy exists to set out the responsibilities of CM Sports and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for CM Sports. It helps them recognise and deal with bribery and corruption issues, as well as understands their responsibilities.

The UK legislation on which this policy is based is the Bribery Act 2010 and it applies to CM Sports conduct in the UK. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- Offer, promise or give a financial or other advantage to another person, whether within the UK, with the intention of inducing or rewarding improper conduct.
- Request, agree to receive or accept a financial or other advantage for or in relation to improper conduct.

You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associated person to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain an advantage in the conduct of business, CM Sports liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to all members at any level.

CM Sports is committed to upholding responsible and fair business practices. It is committed to promoting and maintaining the highest level of ethical standard in relation to all of its business activities. CM Sports will

maintain lawful business practices as a core value and this policy is designed to preserve these values. CM Sports has a zero-tolerance policy towards bribery and corruption and committed to acting fairly and with integrity in all of its business bribery.

CM Sports Directors are responsible for Anti-Corruption, Anti-Fraud, Data Breaches and maintaining the gifts and bribery register.

CM Sports aims:

- To ensure complete compliance with anti-bribery laws, rules and regulations, not just within the UK but in other countries within which CM Sports may carry out its business or in relation to which its business may be connected.
- To enable Team member and persons associated with CM Sports to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others.
- To provide suitable and secure reporting and communication channels and ensure that any information that is reported is properly and effectively dealt with by the CM Sports Directors.

The following principles apply: All team and associated person are required to:

- Act honest, responsibly and with integrity. Understanding the Anti-Bribery laws and their rights.
- Safeguard themselves and the children within their care.
- Comply with any anti bribery and anti-corruption legislation that applies in any jurisdiction.
- Bribery of any kind is strictly prohibited. If you are in doubt, contact the CM Sports Directors to discuss the issue to make sure you are not breaching the policy.

All of this is recorded by the CM Sports Directors; were we would be asked to follow the CM Sports policies and procedures for recording this policy.

Gifts and Hospitality - What is and what is NOT acceptable

This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

Gifts and hospitality

CM Sports – Receipt of Gifts – Your working relationships may bring you into contact with outside organisations where it is normal business practice or social convention to offer hospitality, and sometimes gifts. Offers of this kind to you or your family can place you in a difficult position. Therefore, no employee or any member of his or her immediate family should accept from a supplier, customer or other person doing business with CM Sports, payment of money under any circumstances, or special considerations, such as discounts or gifts of materials, equipment, services, facilities or anything else of value unless;

- They are in each instance of a very minor nature usually associated with accepted business practice.
- They do not improperly interfere with your independence of judgement or action in the performance of your employment.

In every circumstance where a gift is offered, the advice of your line manager must be sought.

CM Sports accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/ received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of £100).
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's compliance manager.
- Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.
- CM Sports recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed.
- The intention behind a gift being given/ received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

What happens if a concern is raised?

This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to CM Sports, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the compliance manager, or the directors.

CM Sports will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

What to do if you are a victim of bribery or corruption

You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, CM Sports understands that you may feel worried about potential repercussions. CM Sports will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

CM Sports will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, the compliance manager, or the Directors immediately.