

Anti-Bribery Policy

Policy statement

The purpose of this Anti-Bribery Policy is to set out our commitment to prevent bribery and corruption in all forms, and to comply with the UK Bribery Act 2010 and Charity Commission regulatory guidance.

The Charity is committed to conducting all of its business activities with integrity, honesty, and transparency, and to ensuring that all of its activities are free from bribery and corruption.

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of The Jade Mutua Foundation Trust (the "Charity"). Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Prohibited Conduct

The following conduct is strictly prohibited and will not be tolerated under any circumstances:

- Offering, promising, giving, requesting, agreeing, receiving or accepting any bribe or other form of improper inducement, whether financial or non-financial, to or from any person or organization, for the purpose of gaining any commercial, contractual, regulatory, or personal advantage.
- Engaging in any conduct that could constitute an offense under the UK Bribery Act 2010, or any other applicable anti-bribery or anti-corruption laws.
- Making any facilitation payments, which are small payments made to secure or expedite routine government action, such as obtaining a permit or processing official documents.
- Failing to disclose any actual or suspected bribery or corruption to the Charity's senior management or, where necessary, to the appropriate authorities.
- Retaliating or threatening retaliation against any individual who reports a suspected violation of this policy, or who refuses to engage in any conduct that could violate this policy.
- Any conflict of interest or self-dealing transaction that may harm the Charity.

Gifts, Hospitality and Donations

The Charity recognises that giving and receiving gifts, hospitality and donations are an established part of building relationships and promoting goodwill. However, it is important that these are managed appropriately to ensure that they do not compromise the integrity and reputation of the Charity. The following rules must be adhered to:

Gifts, hospitality and donations must only be offered when reasonable and necessary to conduct the charity's business. These must not be offered or accepted if doing so might reasonably be seen as an attempt to influence business decisions, or if these are excessive or inappropriate.

All gifts, hospitality and donations must be recorded and approved the Charity's trustees/senior management.

The Charity must not accept donations from sources that are known or suspected to be involved in bribery or corruption.

Due Diligence

The Charity is committed to conducting due diligence on all third-party representatives, such as contractors and suppliers, to ensure that they are reputable and comply with all applicable anti-bribery and anti-corruption laws and regulations.

Responsibilities

All trustees, employees, volunteers, contractors, and third-party representatives of the Charity are responsible for:

Familiarizing themselves with and complying with this policy, as well as all applicable anti-bribery and anti-corruption laws and regulations.

Reporting any actual or suspected bribery or corruption to the Charity's senior management or, where necessary, to the appropriate authorities.

Seeking guidance and advice from the Charity's senior management if they are unsure about whether any conduct may be in violation of this policy.

Training and Communication

The Charity will provide appropriate training and communication to ensure that all trustees, employees, volunteers, contractors, and third-party representatives of the Charity are aware of and understand their obligations under this policy and the UK Bribery Act 2010 and Charity Commission regulatory guidance.

Monitoring and Enforcement

The Charity will monitor compliance with this policy and investigate any suspected violations. Violations of this policy may result in disciplinary action, up to and including termination of employment or other contracts, and referral to the appropriate authorities.