

COUNTERING BRIBERY AND CORRUPTION POLICY

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Document History

Ver	Date	Change
1	23-Dec-10	Initial version (prior to final guidance on the Act which is expected in the New Year)
2	10-Jul-11	Revised following ECAB endorsement of Team Army
3	01-Jul-16	Revised following introduction of Team Ethos brand

1. Purpose and objectives

The overall purpose is to ensure that Team Army/Team Ethos can demonstrate that it has the ways and means of countering any risk of bribery and corruption in its core business activity being sports sponsorship and any other related business activities that are undertaken by the company.

The specific objectives for this anti-corruption Policy are to help ensure that Team Army/Team Ethos will:

- Carry out its business fairly, honestly and openly
- Carry out regular and comprehensive risk assessments to assess the nature and extent of the risks relating to bribery and corruption to which Team Army/Team Ethos might be exposed
- Set out its approach for avoiding any form of bribery or corruption (direct or indirect)
- Keep clear and fully updated records
- Make sure that everyone directly involved in the business, its sponsors and Team Army/Team Ethos member associations are fully aware of the Countering Bribery and Corruption Policy
- Ensure that all contracts with third parties include appropriate provisions relating to the standards required by suppliers, sponsors and their employees and other contractors
- Monitor and review the workings of this policy and update it as necessary
- Respond appropriately if corruption is discovered

2. The approach

To help ensure that Team Army can meet the objectives of this Policy the board of directors of Team Army/Team Ethos (the Board) will:

- Procure a periodic assessment of the nature and extent of the bribery related risks to which the company is exposed by undertaking a biannual risk assessment - in appropriate circumstances the Board may consider engaging an external professional to carry out a particular risk assessment
- Actively promote Board level commitment to the policy by ensuring that the Board formally signs off the quarterly risk assessment and the current version of this Policy (which may have been updated in response to the assessment)
- Ensure that all sponsors are clear on Team Army/Team Ethos's Countering Bribery and Corruption Policy by ensuring that it is explicitly addressed in all sponsorship contracts through a formal acceptance
- Ensure that member sports associations are fully aware of Team Army/Team Ethos's Countering Bribery and Corruption Policy by ensuring that on induction into the scheme they are fully apprised of the Policy and that all those engaged in supporting any account management activities have been formally briefed
- Ensure that all account management activity is actively addressing any bribery related risks identified in the biannual risk assessment by explicitly seeking an annual declaration of compliance from all those involved in account management
- Ensure Board level oversight of the Countering Bribery and Corruption Policy by having a single Director take responsibility for Team Army/Team Ethos policy compliance.

3. Scope

This Policy applies to all Team Army/Team Ethos employees and associates (i.e. self employed contractors engaged by the company, its agents, suppliers, sponsors, business partners and others with whom Team Army/Team Ethos may contract).

4. The Policy

Team Army/Team Ethos is committed to carrying out its business fairly, honestly and openly by adopting a transparent approach to all its business dealings and a zero tolerance policy towards any activity amounting or likely to lead to bribery or corruption.

Team Army/Team Ethos is committed to involving its employees and associates in the development and implementation of its policy of zero tolerance and encourages feedback and input based on experience so that improvements can be made.

a. Consequences of breach

Breach of this policy by a Team Army/Team Ethos employee will be treated as gross misconduct and the employee or employees concerned will be subject to the company's disciplinary procedures.

Team Army/Team Ethos will not do business with agents, suppliers, sponsors or business partners that do not commit to doing business without bribery and will cease all business dealings with any such organisation that is subsequently found to have tolerated or deliberately ignored such standards in its own business dealings.

b. Due diligence

As part of doing business with any sponsoring organisation, Team Army/Team Ethos will seek formal acknowledgement of the sponsor's intention to comply with the UK Bribery Act 2010 and that the sponsor understands the basis on which it is engaging in business with Team Army/Team Ethos.

In the event that Team Army/Team Ethos considers any business transaction involves a risk that this Policy may be breached, the matter will be referred to the Board for clearance before further action is taken.

c. Gifts and Hospitality

Team Army/Team Ethos expects the highest standards of honesty and integrity from all its employees and officers. Situations that might reasonably be considered to lead to a conflict of interest for the company must be avoided. Gifts and offers of hospitality must generally not be accepted other than at a level that might ordinarily be considered reasonable. A record of all gifts and hospitality must be kept and will be subject to review from the Board as appropriate.

d. Laws

Team Army/Team Ethos will uphold all laws countering bribery and corruption and this Policy is intended to uphold and support the company's duties under the **UK Bribery Act 2010**.

e. Action you may need to take

Anyone who is made aware of activities that might reasonably be considered to amount to bribery or corruption involving the company or any Organisation and whether or not they are directly or indirectly involved immediately raise the matter with their manager or a Director of Team Army/Team Ethos.

Please send any questions relating to this policy to enquiries@teamarmy.org