

## ANTI-BRIBERY POLICY

### 1 About this policy

- 1.1 Thrive Scotland aims to conduct all business in an honest and ethical manner, with a zero-tolerance approach to bribery, fraud and corruption and a commitment to acting professionally, fairly and with integrity in all business dealings and relationships.
- 1.2 This policy applies in respect of our operations/activities in the UK and overseas.
- 1.3 Any representative of Thrive Scotland who breaches this policy will face disciplinary action, which could result in immediate dismissal or termination of contract.

### 2 Who must comply with this policy?

- 2.1 This policy applies to all persons working on Thrive Scotland's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### 3 What is bribery?

- 3.1 Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 3.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 3.3 All forms of bribery are strictly prohibited. If you are unsure whether a particular act constitutes bribery, raise it with the Board of Directors.
- 3.4 Specifically, you must not:
  - 3.5 give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
  - 3.6 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
  - 3.7 give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
  - 3.8 threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

#### **4 Gifts and hospitality**

- 4.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining Thrive Scotland's image or reputation, or marketing its products and services.
- 4.2 A gift or hospitality is not appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment.
- 4.3 Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent, or be given in secret. Gifts must be given in Thrive Scotland's name.
- 4.4 Promotional gifts of low value may be given to or accepted from existing customers, suppliers and business partners.

#### **5 Record-keeping**

- 5.1 Representatives of Thrive Scotland must declare and keep a written record of all hospitality or gifts given or received, submit all expenses claims relating to hospitality, gifts or payments to third parties and record the reason for expenditure.
- 5.2 All accounts, invoices and other records relating to dealings with third parties including suppliers and customers must be prepared with strict accuracy and completeness.

#### **6 How to raise a concern**

- 6.1 If a representative of Thrive Scotland is offered a bribe, or asked to make one, or suspects that any bribery, corruption or other breach of this policy has occurred or may occur, they must report it in accordance with Thrive Scotland's Whistleblowing Policy as soon as possible.