

ANTI-BRIBERY POLICY

1 About this policy

- 1.1 Thrive Scotland (Thrive) aims to conduct all business honestly and ethically, with zero tolerance of bribery, fraud and corruption, and commitment to professionalism, fairness and integrity in all dealings.
- 1.2 Any representative of Thrive who breaches this policy will face disciplinary action.

2 Who must comply with this policy?

- 2.1 This policy applies to anyone working on Thrive’s behalf in any capacity, including employees, Directors, consultants, volunteers, contractors, third-party representatives and partners.

3 What is bribery?

- 3.1 Bribery is an inducement or reward for action which is illegal, unethical or improper. Bribes can be money, gifts, loans, fees, hospitality, services, discounts, contract awards or other.
- 3.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.
- 3.3 All bribery is prohibited. If you are unsure whether an act is bribery, ask the Board of Directors.
- 3.4 Specifically, you must not:
- 3.5 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 which you suspect is made with the expectation of a business advantage for them or anyone else;
- 3.7 offer any payment to a government official to facilitate a routine or necessary procedure;
- 3.8 threaten or act against someone who has refused to offer or accept a bribe or 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, appropriate hospitality for building relationships, maintaining Thrive’s reputation or marketing its services.
- 4.2 Unduly lavish gifts or hospitality could be or seem to be inducement for preferential treatment, and are inappropriate.
- 4.3 Gifts must be of appropriate type and value depending on the situation and reason for the gift. Gifts must not include cash or be given in secret. Gifts must be given in Thrive’s name.
- 4.4 Low cost promotional gifts may be given to or accepted from customers, suppliers or partners.

5 Record-keeping

- 5.1 Thrive representatives 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 reasons for expenditure.
- 5.2 All records of dealings with third parties must be strictly accurate and complete.

6 How to raise a concern

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

7 Policy review

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| Policy owner | Director of Finance |
| Reviewed annually | Board of Directors |
| Policy date | October 2017, reviewed August 2019 |
| Next policy review date | August 2020 |