

Anti-Bribery Policy

It is PBE's policy to conduct all of its business in an honest and ethical manner. PBE takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its dealings wherever it operates. PBE is also committed to implementing and enforcing effective systems to counter bribery.

Who is covered by the policy?

This policy applies to all individuals working at PBE (whether permanent, fixed-term or temporary), consultants, contractors, volunteers and any other person providing services to PBE.

What is a bribe?

A bribe is a financial or other advantage offered or given:

- To anyone to persuade them to or reward them for performing their duties improperly
- To any public official with the intention of influencing the official in the performance of their duties

Gifts and Hospitality

This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with PBE's policy. PBE will not provide gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.

You must not accept from or give to any third party any gift, hospitality or other personal benefit that is likely to influence (or which other people may reasonably think is likely to influence) your judgement or be construed as bribery or a conflict with your duties to any charity partner or colleague. All gifts must be declared to your line manager.

In these circumstances, you will be subject to formal investigation under PBE's disciplinary procedures, and disciplinary action up to and including summary dismissal may be applied.

Facilitation payments and kickbacks

PBE does not make, and will not accept, facilitation payments or "kickbacks" of any kind. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by PBE.

Donations

PBE does not make contributions of any kind to political parties. No charitable donations will be made for the purpose of gaining any commercial advantage.

Record Keeping

PBE will keep financial records and have appropriate internal controls in place which will evidence the business reason for making any payments to third parties.

All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with PBE's Expenses Policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts may be kept "off-book" to facilitate or conceal improper payments.

Raising Concerns

Employees should raise any concerns or suspicions of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.