

Anti-Bribery and Corruption Policy

1. What does this policy cover?

1.1 This anti-bribery policy exists to set out the responsibilities of the Ruth Strauss Foundation (“RSF”) and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 It also exists to act as a source of information and guidance for those working for RSF. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. Policy statement

2.1 RSF is committed to working in an ethical and honest manner and is committed to implementing and enforcing systems to ensure bribery is prevented. RSF has zero tolerance for bribery and corrupt activities. RSF are committed to acting professionally, fairly, and with integrity in all dealings and relationships, wherever in the world RSF operate.

2.2 RSF will uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which RSF operate. RSF are bound by the laws of the UK, including the Bribery Act 2010, in regards to conduct both at home and abroad. RSF is also committed to preventing the organisation being used for money laundering or the handling of criminal property.

2.3 RSF recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine for the Trustee(s), employee(s), volunteer(s) or other individuals who may be involved. If our organisation is discovered to have taken part in corrupt activities, RSF may be subjected to an unlimited fine, and face serious damage to our reputation. It is with this in mind that RSF commit to preventing bribery and corruption in our organisation and take our legal responsibilities seriously.

3. Who is covered by the policy?

3.1 This anti-bribery policy applies to anyone acting on our behalf in any capacity, including all Employees (whether temporary, fixed-term, or permanent), Consultants, Volunteers, agency workers, seconded workers, interns, agents and third party-representatives or any other person or persons associated with us, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee and Advisory Group members at any level.

3.2 In the context of this policy, third-party refers to any individual or organisation RSF works with, including our sponsors. It refers to grantees, suppliers, distributors, agents, advisers, and government and public bodies.

3.3 Any arrangements our organisation makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4. Definition of bribery

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

4.4 Bribery is illegal. Employees, Volunteers or Trustees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Chair of Trustees.

5. What is and what is NOT acceptable

This section of the policy refers to 5 areas:

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable contributions
- Anti-Money Laundering (AML) and Proceeds of Crime

5.1 Gifts and hospitality

RSF allows the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in the name of RSF.

Retention of accepted gifts by the recipient is at the discretion of the CEO.

A written record must be kept of all gifts and hospitality accepted, declaring the following:

- Description of gift
- Date of gift receipt
- Source of gift
- Value of gift (or rough estimate)
- Reason for gift
- Declaration of use of gift with timings for use
- Contact details of gift provider

This must be shared with the Head of Finance and CEO. All relevant expenses incurred must be in accordance with RSF's Staff and Personnel Expenses Policy and explained.

5.2 Facilitation Payments and Kickbacks

RSF does not accept and will not make any form of facilitation payments of any nature. RSF recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. RSF recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

RSF does not allow kickbacks to be made or accepted. RSF recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.3 Political Contributions

RSF will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates.

RSF may undertake political campaigning and activities in the context of supporting the delivery of its charitable objects provided that such campaigning and activities are not the continuing and sole activities of the charity. Grants can be made to organisations which carry out political campaigning and activities which RSF could do directly provided that that relevant charity law is complied with and an appropriate grant agreement is put in place. Trustees, Volunteers and Employees must be careful to ensure that any such grants are not used to facilitate and conceal acts of bribery.

RSF will ensure that all such grants are not offered/made without the approval of the Trustees.

5.4 Charitable Contributions

RSF may make grants to charities, and may provide other services, such as any of the Trustees', Volunteers' or Employees' expertise or time assisting other charities, and it will record all charitable grants that are made.

Trustees, Volunteers and Employees must be careful to ensure that charitable grants are not used to facilitate and conceal acts of bribery.

RSF will ensure that all charitable grants made are legal under local laws and practices, and that donations are not offered/made without the approval of the Trustees.

5.5 Anti-Money Laundering (AML) and Proceeds of Crime

5.5.1 RSF is committed to ensuring that the charity is not used to further money laundering, terrorist financing, or other financial crime. RSF will comply with the Proceeds of Crime Act 2002, the Terrorism Act 2000 and relevant Charity Commission guidance.

5.5.2. All Trustees, Employees and Volunteers must remain alert to unusual or suspicious donations, including but not limited to:

- large or unexpected donations with no clear link to RSF;
- donations from unknown individuals or organisations where verification is not possible;
- requests to refund donations to a different account;
- donations made in cash or via complex or opaque mechanisms;
- donors who seek undue influence or conditions inconsistent with RSF's objects;
- overseas donations from high-risk jurisdictions.

5.5.3. Where concerns arise about the legitimacy, source or purpose of a donation, RSF will conduct proportionate due diligence, which may include verifying the donor's identity, checking corporate or charitable status, and assessing potential reputational, legal or financial risks.

5.5.4. RSF reserves the right to refuse or return any donation that is suspected to be linked to criminal property, money laundering or terrorist financing, or that poses unacceptable risk to the charity's reputation or beneficiaries.

5.5.5. Any suspicions relating to possible money laundering or criminal property must be reported immediately to the Chair of Trustees and the Treasurer. RSF will consider whether a disclosure is required to the National Crime Agency and whether the incident must be reported to the Charity Commission as a serious incident.

6. Trustee, Volunteer and Employee Responsibilities

6.1 As a Trustee, Volunteer or Employee of RSF, you must ensure that you comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

6.2 All Trustees, Volunteers and Employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Chair of Trustees.

6.4 If any Trustee, Volunteer or Employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. RSF has the right to terminate a contractual relationship with a Volunteer or Employee if they breach this anti-bribery policy.

7. What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- How to raise a concern.
- What to do if you are a victim of bribery or corruption.
- Protection.

7.1 How to raise a concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to RSF, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Chair of Trustees.

RSF will familiarise all Volunteers, Employees and Trustees with its Whistleblowing Policy so Volunteers and Employees can vocalise their concerns swiftly and confidentially.

7.2 What to do if you are a victim of bribery or corruption

You must tell the Chair of Trustees or Treasurer as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7.3 Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, RSF understands that you may feel worried about potential repercussions. RSF will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

RSF will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Chair of Trustees.

7.4 Reporting

Any Trustee, Employee, Volunteer or other individual involved or connected with the Ruth Strauss Foundation, who has any concerns in relation to this policy or who believes that any corruption may have occurred or is or might occur should contact the Chair of Trustees in the first instance.

RSF Chair of Trustees: Terry Grote – terry.grote@ruthstraussfoundation.com

RSF Treasurer: Phil Glyn-Smith – phil.glynsmith@ruthstraussfoundation.com

If it is not appropriate to contact the above named person you should:

- Report serious incidents to the Charity Commission by emailing rsi@charitycommission.gov.uk
- Report bribery to the National Crime Agency by emailing ContactICU@nca.x.gsi.gov.uk
- Report terrorist financing offences under the Terrorism Act 2000 to the police by emailing S19Alerts@met.pnn.police.uk or call the Anti-Terrorist Hotline on 0800 789 321.

8. Training and communication

8.1 RSF will provide a copy of this policy as part of the induction process for all new Volunteers, Employees and Trustees. Volunteers, Employees and Trustees will also be asked annually to formally accept that they will comply with this policy.

8.2 RSF's anti-bribery and corruption policy and zero tolerance attitude will be clearly communicated to all grantees, suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

8.3 RSF will provide relevant anti-bribery and corruption training to volunteers, employees and Trustees where it is felt their knowledge of how to comply with the Bribery Act needs to be enhanced.

9. Record keeping

9.1 RSF will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made.

9.2 RSF will maintain accurate records of donations, grants and financial transactions to support the identification of suspicious activity and ensure compliance with the Proceeds of Crime Act 2002.

10. Monitoring and reviewing

10.1 RSF's Governance Advisory Group is responsible for monitoring the effectiveness of this policy. They will review the implementation of it on a regular basis and will assess its suitability, adequacy, and effectiveness.

10.2 This policy and the internal control systems and procedures designed to prevent bribery and corruption will be reviewed periodically to ensure that they are effective in practice. Measures include review of risk assessment at each board and GAG meeting.

10.3 Any need for improvements will be applied as soon as possible. Employees, Volunteers and Trustees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to Phil Glyn-Smith and the Head of Finance: phil.glynsmith@ruthstraussfoundation.com | finance@ruthstraussfoundation.com.

10.4 This policy does not form part of an Employee's contract of employment and RSF may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

11. Hallmarks of Bribery and Corruption

11.1 It is important that all Trustees, Volunteers, Employees and other individuals involved with RSF are able to identify behaviours which are indicative of bribery or corruption offences. The below is not a complete list of indicators but is intended to help individuals identify certain key indicators of bribery or corruption:

- Abnormal cash payments or abnormally high grants being made to one charity without adequate explanation
- Abusing decision processes or delegated powers in specific cases
- Agreeing contracts not favourable to RSF or not in furtherance of its charitable aims (e.g. grant terms or time period)
- RSF procedures, policies or guidelines not being followed
- Invoices being agreed in excess of contract without reasonable cause
- Lavish gifts being made or received
- Making unexpected or illogical grant decisions
- Missing documents or records regarding meetings or decisions
- Pressure exerted for payments to be made urgently or ahead of schedule
- Purchasing unnecessary or inappropriate items
- Inaccurate or incomplete travel and expenses forms
- Unusual behaviour of a colleague

12. List of risk factors to consider when assessing bribery risks within RSF:

- Reputation – consequences
 - Sector – the nature of the sector in which RSF operates
 - Partners – their size, culture, policies, processes
 - Procurement – where processes lack transparency or are unfair
 - New activities – limited knowledge or experience
-

Version Control

This policy was adopted by the Trustees dated 1st March 2021.

This policy should be reviewed at least every 2 years.

Next review date: January 2028.

Version	Updates	Published by	Date
1.0	Original		March 2021
2.0	Updated policy – minor changes	Rachel Edgson	September 2023
2.1	Minor edits and formatting	Ines Thiru / Hazel Day	March 2024
2.2	<ul style="list-style-type: none"> - Replacement of section 5.1 wording to establish alignment with the Foundation’s activities - Addition of detail in section 5.1 on recording of gifts and hospitality - Addition of AML section 5.5 	Rachel Edgson / Ines Thiru	January 2026