



PAWS BRIBERY POLICY

April 2023

Purpose

Bribery is a serious offence under the UK law and can result in significant legal, financial and reputational damage for both individuals and organisations.

PAWS is committed to preventing and detecting bribery in all forms and conducting its affairs with the highest standards of ethics and integrity. This policy outlines our approach to preventing bribery and corruption in compliance with the UK Bribery Act 2010.

Scope

This policy applies to all employees, volunteers, trustees, agents and any other representatives of our charity, as well as any third parties who act on our behalf or provide services to us.

Policy statement

PAWS prohibits any form of bribery by its employees, volunteers, trustees, and agents. This includes offering, giving, soliciting, facilitating a bribe through a third party or accepting any advantage to influence any person or organisation.

Prohibited conduct

The following conduct is strictly prohibited:

- Offering, promising, or giving a financial or other advantage, whether directly or indirectly, to an individual or organisation with the expectation that personal or business advantage will be received or to reward an advantage already given, including to a government official, agent or representative to facilitate or expedite a routine process
- Requesting, agreeing to receive, or accepting a bribe in exchange for a personal or business advantage or as a reward for an advantage already given
- Accepting payment, gift or entertainment or facilitating a bribe from a third party where you know, or suspect, is offered with the expectation to obtain an advantage
- Threatening or retaliating against someone working for or on our behalf who has refused to commit a bribery offence or who has raised concerns under this policy
- Engaging in activities that might lead to a violation of this policy

Gifts, entertainment and expenses

This policy does not prohibit gifts, entertainment or expenses to or from third parties and recognises that these may be part of legitimate business practice. However, these must be reasonable, acceptable and transparent and must not be used to influence or reward individuals in any improper or unethical



way. All gifts, entertainment or expenses received by the charity must comply with the following specifications:

- The value and nature of the gift, entertainment or expense must be reasonable and proportionate to the circumstances
- The gift, entertainment or expense must not be offered or received with the intention to influence or reward an individual in an improper or unethical way
- Expenses: all expenses must be legitimate, reasonable, and proportionate.

Reporting and compliance

All employees, volunteers, trustees and agents of PAWS who become aware or suspect bribery are expected to report it immediately to their line manager or a trustee in the charity. All reports will be kept confidential and investigated promptly and thoroughly. PAWS will not tolerate any retaliation against any person who makes a report in good faith.

Violations of this policy may result in disciplinary action, dismissal from employment, volunteering or any other relationship with PAWS. Additionally, this may result in legal action and / or damages.

Compliance and updates to policy

PAWS will monitor compliance with this policy and take appropriate action to address any violation of the policy.