

South Downs Leisure

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South Downs Leisure

Human Resources Policies  
and Procedures

Anti-Bribery Policy

Date agreed: June 2024



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# South Downs Leisure

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## Introduction

South Downs Leisure (SDL) is committed to conducting business with the highest ethical standards and in compliance with all applicable laws and regulations. This Anti-Bribery Policy outlines our commitment to preventing bribery, ensuring transparency, and promoting integrity in all our operations. This policy applies to all employees, officers, directors, contractors, consultants, agents, and any other individuals or organisations acting on behalf of SDL.

## Policy Statement

SDL prohibits any form of bribery, including but not limited to offering, promising, giving, soliciting, or accepting bribes, either directly or indirectly, to or from any person or organisation, in order to gain an undue advantage or influence a business or government decision. This policy extends to all jurisdictions in which we operate.

## Definitions for the purpose of this policy:

- a) Bribery: The offering, promising, giving, soliciting, or accepting of any undue advantage, financial or non-financial, as a means to influence a decision or action improperly.
- b) Bribe: Any form of reward, gift, payment, loan, donation, favour, hospitality, or other advantage that is provided, directly or indirectly, with the intention of inducing or rewarding improper behavior.
- c) Third Party: Any individual or organisation that is not an SDL employee but acts on behalf of, or provides services to, SDL.

## Compliance with Laws and Regulations

SDL will comply with all applicable anti-bribery laws and regulations in the jurisdictions in which we operate, this includes, but is not limited to, the UK Bribery Act 2010.

## Prohibited Conduct

The following activities are strictly prohibited under this policy:

- a) Offering, promising, giving, or accepting bribes, kickbacks, or improper payments to or from any person or organisation, including government officials, public officials, private sector counterparts, or any individual or entity in a position of influence.
- b) Influencing or attempting to influence any business or government decision through bribery or other improper means.



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c) Providing or accepting gifts, entertainment, or hospitality that could reasonably be perceived as intended to influence a business or government decision or create an obligation.

d) Using intermediaries or third parties, such as agents, consultants, or contractors, who engage in bribery or other corrupt practices on behalf of SDL.

e) Creating or maintaining any off-the-books accounts or transactions for the purpose of facilitating bribery or other corrupt practices.

## **Gifts, Hospitality, and Expenses**

Gifts, hospitality, and expenses offered or received in the course of business must be modest, proportionate, and reasonable. Employees must always exercise sound judgment and ensure that such offerings or receipts do not violate this policy or create an appearance of impropriety.

## **Due Diligence on Third Parties**

SDL will conduct appropriate due diligence on third parties, such as agents, consultants, and contractors, to ensure their commitment to ethical business practices and compliance with anti-bribery laws. Failure to meet the required standards may result in termination of the business relationship.

## **Reporting Suspected Bribery**

All employees have an obligation to promptly report any suspected or actual incidents of bribery or corruption. Such reports should be made to the designated compliance officer or through the company's confidential reporting mechanisms. SDL will ensure that any reports are treated confidentially and that no retaliation will be taken against those who report in good faith.

## **Consequences of Non-Compliance**

Violation of this Anti-Bribery Policy may result in disciplinary action, up to and including termination of employment or contractual relationships. Additionally, individuals found to be involved in bribery or corruption may face legal consequences, including criminal prosecution.

## **Training and Communication**

SDL will communicate this policy to all employees so that they understand and comply with this policy. Regular updates and reminders will be provided to reinforce the importance of anti-bribery measures.



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## Policy Review

This Anti-Bribery Policy will be periodically reviewed to ensure its effectiveness and compliance with applicable laws and regulations. Any necessary revisions will be made and communicated to all relevant individuals.

This Anti-Bribery Policy represents SDL's commitment to conducting business with integrity and transparency. All employees and stakeholders are expected to uphold the principles outlined in this policy and report any suspected violations promptly.

## Legislative Framework

Data Protection Act 2018

## Background Document

Relevant policies are: -

- Disciplinary Policy
- Probation Policy
- Code of Conduct

## Monitoring and Review

This Policy will be monitored and reviewed by the appropriate Officer\*.

Date of Issue: June 2024

## Updates to policy:

Issue No	Description of Revision	Date	Action By
Draft	First issue	June 2024	

Share - Public - Documents\3. People - Staff\3.16 HR Policies - Staff Handbook\Anti Bribery Policy



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