

Guernsey Island Games Association LBG

Anti-Bribery and Corruption Policy

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1. Background and purpose

1.1. The purpose of this Anti-Bribery and Corruption (ABC) Policy (Policy) is:

- (a) to make sure the independence, integrity and professionalism of the Guernsey Island Games Association (GIGA) and its officers is maintained at all times;
- (b) to safeguard GIGA and its officers against criminal or regulatory sanctions when not complying with ABC laws and regulations; and
- (c) to safeguard GIGA and its officers against allegations of Bribery and/or corruption (reputational risk)

1.2. This Policy is part of a wider policy and control framework to combat financial crime and should be read and understood in conjunction with:

- (a) Anti-Money Laundering, Counter Terrorism Financing and Anti-Tax Evasion Policy (AML/CTF/ATE);
- (b) Code of Conduct;
- © Child Protection Policy;
- (d) Data Protection Policy and General Data Protection Requirements (GDPR);
- (e) Diversity and Inclusion;
- (f) Safeguarding Policy;
- (g) Whistleblowing Policy.

2. Scope

2.1. This Policy applies to GIGA and to all board members, officers and member organisations and should be regarded as the minimum standard requirement.

3. Definition and abbreviations

3.1. Definitions:

(a) **Bribery** - the offer, provision or receipt of any gift, loan, payment, reward or other advantage to, or from, any person as an inducement or reward for improper performance of a function. It is necessary to consider the context and intent of the inducement to assess whether a transaction is a bribe or the subject of corruption.

(b) **Corporate Hospitality** - invitation to any form of social, hospitality, sporting, charitable or entertainment event.

(c) **Facilitation Payment** - the payment or receipt of a (generally small) sum of money to a public official (or associated person) as a way of expediting or securing the performance of a routine governmental action.

(d) **Gift** - anything with a tangible benefit, given or received, with the aim of enhancing or developing a business relationship. Gifts include loans, services, the use of facilities, the invitation to any form of social, hospitality, sporting, charitable or entertainment event, meal, leisure activity, travelling, (business) seminars abroad. Gifts do not include business breakfasts, lunches and dinners.

(e) **Politically Exposed Person** – a person who is able to exert a major influence on individuals or organisations as a result of their seniority in a public position.

(f) **Series** - multiple incidents occurring within any 12 month period.

Abbreviations

ABC - Anti-Bribery and Corruption, as covered in this policy

PEP - Politically Exposed Person – a person in a prominent public position or someone who can influence such position as defined in the Guernsey Financial Services Commission handbook as updated from time to time

4. Standards

4.1 Policy Standards

GIGA has a zero-tolerance approach to financial crime, including bribery, corruption, and commission of acts of fraud. GIGA and its officers must not, therefore, directly or indirectly:

(a) offer, give, solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company, wherever they are located, whether they are a public official or body or private person or company and whether or not the local customs may be tolerant towards bribery;

(b) gain any commercial, contractual or regulatory advantage for GIGA or any of its officers in a way which is unlawful or unethical; and

(c) give or receive facilitation payments unless they are made under duress in order to protect against loss of life, limb or liberty.

4.2 Gifts and Corporate Hospitality

Officers must follow the Gifts and Corporate Hospitality Procedure:

(a) for any Gift received with a value exceeding GBP 100 (or currency equivalent);

(b) for a series of Gifts received from the same person (any value);

(c) for any Corporate Hospitality invitations received with a value exceeding GBP 250 (or currency equivalent);

(d) for a series of Corporate Hospitality invitations received from the same person (any value);

(e) when offering any Gift or Corporate Hospitality to a client or supplier (any value).

This includes a requirement to declare the Gift or Corporate Hospitality Declaration and for two other GIGA Directors to review and approve prior to acceptance/gifting.

4.3. Gifts and/or Corporate Hospitality invitations must not be accepted if:

(a) they are cash (including money, cheques, vouchers and reimbursements of expenses);

(b) these may influence or may reasonably appear to influence the behaviour of a GIGA officer and/or the relationship with the giver.

4.4. Gifts and/or Corporate Hospitality invitations must not be offered:

(a) if these may influence or may reasonably appear to influence the behaviour of the recipient in respect of obtaining or retaining business or securing an improper advantage for GIGA or any associate;

(b) to the same person more than once every 12 months;

(c) to any PEP.

4.5. The cost of travel and accommodation associated with a Gift or Corporate Hospitality must be borne by the person receiving the approved Gift or Corporate Hospitality.

Policy violations

4.6. Any violation of this Policy must be reported to the GIGA LBG Chair or Treasurer, or in the event of the matter involving these individuals, to the GIGA Secretary, followed by reporting to the next available board member. This reporting protocol is the same as for the GIGA Whistleblowing Policy.

Policy exceptions

4.7. Any specific deviation from this Policy must be subject to prior approval.

5. Policy maintenance - roles and responsibilities

5.1. The GIGA Board of Directors is the required approval body for material changes to this Policy. The Board is responsible for setting the risk appetite in accordance with this Policy.

5.2 Risk appetite – The GIGA Board has a zero risk appetite in respect of financial crime, money laundering and matters relating to ABC.

6. Policy adherence - consequence management

6.1. Not complying with this Policy may result in internal and/or external disciplinary measures including but not limited to administrative and/or criminal sanctions, suspension or dismissal.

7. Implementation

Policy implementation

7.1. The Board is responsible for the implementation of changes to this Policy which must be completed within three months of the date of its publication.