



Antibribery & Corruption

NOPS Policy

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SCOPE

1. The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that Smart Awards' Network Operative Passport Scheme (NOPS) business is conducted in a socially responsible manner.
2. This policy covers:
 - Bribes
 - Gifts and hospitality
 - Facilitation payments
 - Political contributions
 - Charitable contributions.

RESPONSIBILITIES

3. This is policy is for use of the Network Operative Passport System (NOPS). This policy is for individuals and organisations recording and accessing individual information stored on NOPS. Smart Awards has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Smart Awards has the day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.
4. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of individuals and organisation. All Smart Awards employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. All persons must notify Smart Awards as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.
5. Smart Awards reserve our right to terminate our contractual relationship with others if they breach this policy.

POLICY STATEMENT

6. It is our policy to conduct our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
7. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the Bribery Act, in respect of our conduct.
8. Bribery and corruption are punishable for individuals by imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

9. Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
10. All who work for or on behalf of Smart Awards must not engage in any form of bribery, either directly or through any third party.
11. Gifts and hospitality: We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable.
- Smart Awards must not offer or give any gift or hospitality which could be regarded as illegal or improper which exceeds £50.00 in value for each individual gift or hospitality
 - (Not to exceed a total value of £100 in any financial year), unless approved in writing by Smart Awards
 - Smart Awards may not accept any gift or hospitality from our business partners if: it exceeds £50.00 in value for each individual gift or hospitality (not to exceed a total of £100 in any financial year), unless approved in writing by Smart Awards Board or there is any suggestion that a return favour will be expected or implied.
 - If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to Smart Awards and donated to charity
 - The intention behind the gift should always be considered.
12. Charitable and Political Contributions: We do not make donations, whether in cash or kind, in support of any political parties, individuals or organisations as this can be perceived as an attempt to gain an improper business advantage.
13. Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, Smart Awards must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of Smart Awards. All charitable contributions should be publicly disclosed.

PROCESS

14. How to raise a concern: You are encouraged to raise concerns about any issue or suspicion of antibribery and corruption at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with Smart Awards.
15. Smart Awards aim is to ensure concerns are handled sensitively and speedily to enable us to:
- Demonstrate our commitment to our customers
 - Demonstrate our commitment to providing the best possible service
 - Help to find out about things that have gone wrong so we can fix them
 - Help to prevent things going wrong again in future
 - To show tractability of all concerns received

- To satisfy contractual needs

16. What to do if you are a victim of bribery or corruption: It is important that you tell Smart Awards as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

17. Raising a concern

- Step 1 - the concern is raised and reported to Smart Awards
- Step 2 - the concern is added to Smart Awards risk register
- Step 3 – acknowledgment of receipt of the concern will be sent with 1 day
- Step 4 – the concern will then be investigated following the investigation policy
- Step 5 – outcome of concern is communicated within 28 days of receiving a complaint, confirming our final position

18. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

19. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

20. Our zero-tolerance approach to bribery and corruption is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

21. Monitoring and review: Smart Awards will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

22. Record keeping: Smart Awards keeps financial records and has appropriate internal controls in place which will evidence the business reason for making payments to third parties. Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

23. All have the right to appeal following an investigation by following Smart Awards appeals process.

REVIEW OF THIS POLICY

24. This policy is reviewed and revised annually in response to feedback, changes in legislation and guidance and from other appropriate organisations.

PROCESS FOR RAISING A CONCERN

