

ANTI-BRIBERY AND CORRUPTION POLICY - VOLUNTEERS

1 Why we have this Policy

- 1.1 The IET runs its activities with integrity. All of us must work together to ensure that they remain untainted by bribery or corruption, or allegations of it. This Policy is integral to that effort. Our staff colleagues are bound by a similar Policy.
- 1.2 The IET (including all of its subsidiaries, wherever located) is subject to the UK's Bribery Act 2010 (the Act).

2 Who this Policy applies to

- 2.1 This Policy applies to all volunteers.

3 Other documents relating to this Policy

- 3.1 You should also read the IET's:
 - 3.1.1 [Gifts and Hospitality Policy - Volunteers](#)
 - 3.1.2 [Conflicts of Interest Policy - Volunteers](#)
 - 3.1.3 [Volunteer Expenses Policy](#)
 - 3.1.4 [Whistleblowing Guidance](#)

4 What is bribery?

- 4.1 'Bribe' means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
- 4.2 'Bribery' includes offering, promising, giving, accepting or seeking a bribe. They may be more tolerated in some business sectors or countries, and may be called something else (for example, "facilitation payments" or "grease payments").
- 4.3 Under the Act, it is illegal:
 - 4.3.1 to pay or offer to pay a bribe;
 - 4.3.2 to receive or offer to receive a bribe;
 - 4.3.3 to bribe a foreign public official; and
 - 4.3.4 for a commercial organisation (which includes the IET), to fail to have adequate procedures in place to prevent bribery.
- 4.4 The IET's position is simple: we conduct our activities to the highest legal and ethical standards. We will not be party to bribery or corruption in any form. The IET takes a zero tolerance approach to bribery corruption by our people and our third party representatives.
- 4.5 All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your IET staff contact.
- 4.6 Specifically, you must not:
 - 4.6.1 give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
 - 4.6.2 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
 - 4.6.3 give or offer any payment to a government official in any country to speed up a routine or necessary procedure;

- 4.6.4 take un-receipted, unauthorised or illegitimate payments directly or indirectly on behalf of the IET, even if it is common practise to do so.

5 Gifts and hospitality

- 5.1 This policy does not prohibit 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. Our '[Gifts and Hospitality Policy – Volunteers](#)' sets out the parameters for such hospitality, and the procedure for declaring and or obtaining approval for gifts and hospitality where necessary.

6 What happens if you do not follow this Policy

- 6.1 Involvement in bribery and corruption carries many risks. Among them are:
 - 6.1.1 an organisation which pays or accepts bribes is not in control of its affairs;
 - 6.1.2 even an allegation of bribery, let alone an exposure of it, would entail severe reputational damage. The government departments and institutions and companies we work with may well refuse to work with us, and we could not tender for public sector contracts and many private sector contracts;
 - 6.1.3 the Act is one of the widest ranging pieces of legislation in the field, It covers any corrupt act by a UK commercial organisation (which includes the IET and all its subsidiaries) wherever it occurs;
 - 6.1.4 any person guilty of bribery will be subject to fines and/or imprisonment (up to 10 years under the Act);
 - 6.1.5 if the IET is found of guilty of bribery – or even of failing to have adequate procedures in place to prevent it – it will be subject to large fines;
 - 6.1.6 the cost of our insurance cover could increase very significantly; and
 - 6.1.7 good people will not want to work for us.
- 6.2 If you give or take a bribe while volunteering for the IET, you may be subject to disciplinary action under the IET's [Rules of Conduct](#) or [Volunteer Code of Conduct](#).

Appendix

Control Sheet

Policy

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Document reviewer: Dom Pickersgill and Sandra Godman – Manager, Volunteer Support
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Review/change history

Date of Review/Change	Summary of changes	Version no.
January 2014	First version	1.0
July 2015	References to 'staff and contractor' which are in complementary policy have been removed. Reference to Whistleblowing Policy (staff policy) removed. Reference to on-line training removed and will be replaced when available to volunteers.	2.0
January 2016	Reformatted into new layout for Policies. References to new Gifts & Hospitality Policy – Volunteers, Conflicts of Interest Policy – Volunteers and Whistleblowing Guidance inserted.	3.0
January 2018	Reviewed – no changes.	3.0