

TEAM FORCES FUNDING LTD COUNTERING BRIBERY AND CORRUPTION POLICY

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Document History

Ver	Date	Change
1	23-Dec-10	Initial version
2	10-Jul-11	Revised following MoD endorsement of the Team Army model
3	01-Jul-16	Revised following introduction of Team Ethos brand
3.1	1-Feb-21	Minor revise and update
3.2	4-Mar-22	Revised following rebrand of Team Ethos to Team Forces
3.3	9-May-23	Revised following change of our charity name from The Team Army Sports Foundation to the Team Forces Foundation

1. Purpose and objectives

The overall purpose is to ensure that Team Forces Funding Ltd (Team Forces)¹ can demonstrate that it has the ways and means of countering any risk of bribery and corruption in its core business activity being sponsorship of sport, challenge and adventurous activities in the armed forces community and any other related business activities that are undertaken by the company.

The specific objectives for this anti-corruption Policy are to help ensure that Team Forces will:

- Carry out its business fairly, honestly and openly
- Carry out regular and comprehensive risk assessments to assess the nature and extent of the risks relating to bribery and corruption to which Team Forces might be exposed
- Set out its approach for avoiding any form of bribery or corruption (direct or indirect)
- Keep clear and fully updated records
- Make sure that everyone directly involved in the business, its sponsors and Team Forces' member associations are fully aware of the Countering Bribery and Corruption Policy
- Ensure that all contracts with third parties include appropriate provisions relating to the standards required by suppliers, sponsors and their employees and other contractors
- Monitor and review the workings of this policy and update it as necessary
- Respond appropriately if corruption is discovered.

¹ The **Team Forces** programme is a collaboration between Team Forces Funding Ltd (Registered in England and Wales, number 07455308) and the Team Forces Foundation (Registered in England and Wales, charity number 07773783)

2. The approach

To help ensure that Team Forces can meet the objectives of this policy the board of directors of Team Forces (the Board) will:

- Procure a periodic assessment of the nature and extent of the bribery related risks to which the company is exposed by undertaking an annual risk assessment - in appropriate circumstances the Board may consider engaging an external professional to carry out a particular risk assessment
- Actively promote Board level commitment to the policy by ensuring that the Board formally signs off the annual risk assessment and the current version of this Policy (which may have been updated in response to the assessment)
- Ensure that all sponsors are clear on Team Forces' Countering Bribery and Corruption Policy by ensuring that it is explicitly addressed in all sponsorship contracts through a formal acceptance
- Ensure that member sports associations are fully aware of Team Forces' Countering Bribery and Corruption Policy by ensuring that on induction into the scheme they are fully appraised of the Policy and that all those engaged in supporting any account management activities have been formally briefed
- Ensure that all account management activity is actively addressing any bribery related risks identified in the annual risk assessment by explicitly seeking an annual declaration of compliance from all those involved in account management
- Ensure Board level oversight of the Countering Bribery and Corruption Policy by having a single Director take responsibility for Team Forces policy compliance.

3. Scope

This Policy applies to all Team Forces employees and associates (i.e. self employed contractors engaged by the company, its agents, suppliers, sponsors, business partners and others with whom Team Forces may contract).

4. The Policy

Team Forces is committed to carrying out its business fairly, honestly and openly by adopting a transparent approach to all its business dealings and a zero tolerance policy towards any activity amounting or likely to lead to bribery or corruption.

Team Forces is committed to involving its employees and associates in the development and implementation of its policy of zero tolerance and encourages feedback and input based on experience so that improvements can be made.

- **Consequences of breach**
Breach of this policy by a Team Forces employee will be treated as gross misconduct and the employee or employees concerned will be subject to the company's disciplinary procedures.

Team Forces will not do business with agents, suppliers, sponsors or business partners that do not commit to doing business without bribery and will cease all business dealings with any such organisation that is subsequently found to have tolerated or deliberately ignored such standards in its own business dealings.

➤ **Due diligence**

As part of doing business with any sponsoring organisation, Team Forces will seek formal acknowledgement of the sponsor's intention to comply with the UK Bribery Act 2010 and that the sponsor understands the basis on which it is engaging in business with Team Forces.

In the event that Team Forces considers any business transaction involves a risk that this Policy may be breached, the matter will be referred to the Board for clearance before further action is taken.

➤ **Gifts and Hospitality**

Team Forces expects the highest standards of honesty and integrity from all its employees and officers. Situations that might reasonably be considered to lead to a conflict of interest for the company must be avoided. Gifts and offers of hospitality must generally not be accepted other than at a level that might ordinarily be considered reasonable. A record of all gifts and hospitality must be kept and will be subject to review from the Board as appropriate.

➤ **Laws**

Team Forces will uphold all laws countering bribery and corruption and this Policy is intended to uphold and support the company's duties under the **UK Bribery Act 2010**.

➤ **Action you may need to take**

Anyone who is made aware of activities that might reasonably be considered to amount to bribery or corruption involving the company or any organisation and whether or not they are directly or indirectly involved immediately raise the matter with their manager or a Director of Team Forces.

Please send any questions relating to this policy to enquiries@teamforces.org