
ANTI-BRIBERY AND CORRUPTION POLICY

Approved by Board of Governors: 7 July 2011

Introduction

Trinity Laban is committed to acting professionally, fairly and with integrity and does not tolerate any form of bribery or corruption.

The purpose of this policy is to set out the responsibilities of departments and employees in observing and upholding our position on bribery and corruption.

Scope

This policy applies to Trinity Laban's employees (staff, contract and temporary) and extends to all our dealings and transactions with partners, collaborators and agents in all countries in which we or our associates operate.

Policy

Trinity Laban does not engage in bribery or any form of unethical inducement or payment. All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the activity of the institution.

Trinity Laban will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. Trinity Laban does not make direct or indirect contributions to political parties

Trinity Laban employees must declare hospitality or gifts accepted or offered, which will be subject to managerial review.

Responsibilities

The Principal is the Board director with primary responsibility for implementing this policy and for reporting to the Board of Directors.

All employees have a duty under the Financial Regulations to report any instances of bribery or corruption to the Chairman of the Audit Committee via the Clerk to the Board of Governors (or via the Company Secretary in cases where the Clerk to the Board of Governors is absent or is personally implicated in the allegations). The Audit Committee will take remedial steps immediately

Training and communications

This policy will be communicated to employees through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners.

Managers, employees and agents will receive relevant guidance on how to implement this policy in the scope of their employment.

Monitoring and review

The Principal's Management Group will review the implementation of this policy in respect of its suitability, adequacy and effectiveness and make improvements as appropriate. It will periodically report the results of this process to the Audit Committee, which will make an independent assessment of the adequacy of the policy and disclose any material non-compliance in the Annual Report to Board.

Internal controls and audit

Trinity Laban will maintain accurate records - available for inspection - which properly and fairly document all financial transactions. Internal control systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

Anti-bribery and corruption

STAFF GUIDANCE

Staff should never engage in bribery or any form of unethical inducement or payment.

Gifts and hospitality

We recognise that giving and accepting gifts can be part of building normal business relationships. In different geographical locations, this practice can vary significantly, often depending on local laws and specific customs. But some gifts and hospitality can create improper influence and conflicts of interest. In some instances they can be viewed as bribes that could damage Trinity Laban's reputation or even break the law.

Giving and receiving gifts and hospitality

While working for Trinity Laban, it is possible that you will be offered a gift or hospitality by a service provider or business partner. Equally, in some cases, you may want to offer a gift or hospitality to a supporter, donor, or business partner on behalf of the institution.

(Reference should also be made to Trinity Laban's Business Entertainment Policy)

If someone makes an offer that could influence your judgement, for example by encouraging you to overlook normal tendering or purchasing processes, or lead to a conflict of interest, you must not accept it. Any hospitality you offer or receive must be appropriate to the circumstances. It should be judged on a like-for-like basis. In other words, the type of the hospitality you receive should be similar to what you would offer as a host.

Hospitality is regarded as any event involving more than just a meal - breakfast, lunch or dinner - with a service provider/business contact (paid for by the provider). This can include attendance at a sporting or arts event, or involving people who are not employees of either Trinity Laban or the host company, such as spouses or partners. The offer or acceptance of any hospitality valued at more than £100 must be reported to your line manager and approved in advance where possible.

Governments in some countries have significantly stricter conditions relating to offering and accepting gifts and hospitality. Breaking these rules can be a serious offence. If you deal with overseas governments or institutions, make sure you are familiar with the rules that apply. If you are in any doubt, consult your line manager.

Acceptable gifts

You can generally accept low value gifts such as pens, flowers, diaries, calendars or a bottle of wine, or other promotional material. Gifts of a higher value are always inappropriate.

Know the limits

The offer and acceptance of any **hospitality** with a value of more than £100 or of **gifts** worth more than £50 must be reported to your line manager and approved in advance where possible.

If hospitality is provided for genuine business reasons, it is not taxed. In all other cases, it will be treated as a gift and will be taxed. You should be aware that reciprocal entertaining arrangements (where you might take turns with a supplier in entertaining each other) are taxed

Line managers should report all gifts or hospitality – whether accepted or not – to the Director of Finance who will maintain a register for audit purposes. This does not apply to items of a very low value such as promotional material.

Further information:

If you are in any doubt about offering or accepting a gift or hospitality, it is important that you discuss the situation with your line manager.

When considering whether to offer or accept a gift or hospitality **make sure that it does not:**

- negatively affect the institution's activities
- break the law in the UK, or in the country of the person or organisation who provided it
- influence a business decision or transaction
- give you an unwelcome duty to do something or put you in a difficult position
- involve regular offers from any one organization or individual
- involve receiving something which you could not offer in return
- create a negative perception of the institution

Branding and corporate identity

The reputation of the Trinity Laban brand is fundamental to the success of the institution.

- You must never use Trinity Laban's logos or corporate identity for your own benefit or to carry out private transactions.
- You must ensure that all company-branded internal and external communications comply with the Trinity Laban brand guidelines - If you need to use logos or any other element of our corporate identity for business activities, please contact **the Marcomms team**.

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