

CABI Policies & Procedures

Bribery

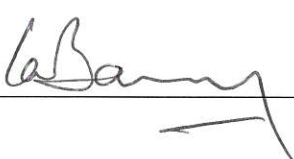
Contents

1	REVISION HISTORY	2
2	APPROVALS	2
3	SCOPE	3
4	PURPOSE	3
5	DEFINITIONS	3
6	TYPES OF BRIBERY	3
7	HOSPITALITY & GIFTS	4
8	POLITICAL AND CHARITABLE CONTRIBUTIONS	4

1 REVISION HISTORY

Revision	Date	By	Change
0	13/12/2011	R Sloley	
1			

2 APPROVALS

Name / Role	Signature and Date
IAN BARRY CFO.	 19.1.12

3 SCOPE

The policy applies to all CABI staff worldwide and to any associated persons providing services to CABI e.g. agents, collaborators contractors (see section 5 definitions below).

4 PURPOSE

To ensure all CABI employees and associated persons are aware of the requirements of the UK Bribery Act 2010 and act in accordance with the CABI Bribery policy. All acts of bribery are strictly prohibited and breaches of the policy are considered a disciplinary matter for staff and a breach of contract for associated persons. Acts of bribery may result in criminal conviction under the Bribery Act.

Bribery is one aspect of fraud and as such this policy should be seen in the context of the policies, procedures and standards of behaviour defined in the CABI anti-fraud policy.

[Anti-Fraud Policy](#)

It is also referred to in the CABI Code of Conduct.

[Code of Conduct](#)

5 DEFINITIONS

Bribery is defined as:

'Giving someone a financial or other advantage to perform their function or activities improperly or to reward that person for having already done so'. 'Improper' means performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust'

The test of whether an activity has been performed improperly is a test of what a reasonable person in the UK would expect in relation to the performance of that activity'. For CABI this test applies to all its worldwide activities. Local custom and practice has to be disregarded in this respect.

An associated person is defined as:

Any person who performs services for, or on behalf of, CABI. An associated person could be an individual or could be an incorporated or unincorporated body. These include:

- Agents, collaborators and contractors.
- Suppliers performing services.
- An agent/employee of a CABI Joint Venture e.g. Conidia.

6 TYPES OF BRIBERY

Under the terms of the UK Bribery Act, there are 4 types of bribery offence:

- Bribery of another person
- Being bribed
- Bribery of foreign public officials
- Failure of organisations to prevent bribery

If any member of staff is aware of any acts of bribery then they have a duty to report them in accordance with the 'whistle blower policy'

[Whistle Blowing Policy](#)

7 HOSPITALITY & GIFTS

The giving and receiving of hospitality and gifts could be considered as acts of bribery and are only allowable as long as it can be demonstrated that they are **'reasonable and proportionate'**.

This is the overriding test and the minimum requirement to be 'reasonable and proportionate' means that the giving of a hospitality or gift should not influence a business decision.

Therefore, any CABI employee proposing to provide or receive hospitality or gifts to /from a third party over the value of £100 per person (or local currency equivalent) should get the prior approval of their line manager. Also, prior approval is required where modest levels of hospitality and /or gifts are being provided to a number of non CABI individuals at a single event with a total value of over £500.

Transparency is critical and so a register of hospitality and gifts will be retained. Where prior authorisation is given, as in the circumstances outlined above, then the line manager authorising the hospitality/ gift should inform Finance (Accounts Payable - Sandra Eldridge) by e-mail to ensure it is recorded.

8 POLITICAL AND CHARITABLE CONTRIBUTIONS

Political and/or charitable contributions can and have been used by the unscrupulous as a cover for acts of bribery. As a 'not for profit' organisation itself, CABI does not generally make political or charitable contributions and therefore any employee or associate wishing to make such contributions directly from CABI funds (over the value of £100) should ensure they get authorisation from the CFO.

This expressly does not prevent employees or associates organising fund raising activities on behalf of 'good causes'.