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# Lotus Flower Trust

UK Charity No 1127316

## ANTI BRIBERY and CORRUPTION POLICY

**This policy exists to set out the responsibilities of Lotus Flower Trust (“LFT”), and all those who work for or represent LFT in regards to observing and upholding LFT’s zero tolerance position on bribery and corruption**

### Policy statement

LFT is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure that bribery is prevented. LFT has zero tolerance for bribery and corrupt activities and is committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever it operates. LFT will uphold the laws of the UK, including the Bribery Act 2010, and all laws relating to bribery and corruption in all other jurisdictions in which it operates.

### Who is covered by the policy?

This policy applies to all Trustees of LFT, employees, executives, consultants, contractors, volunteers, sponsors, and any other person or persons associated with and representing LFT, no matter where they are located (within or outside the UK).

### Definition of Bribery

Bribery means the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so as to induce or influence any action or decision. A bribe is any inducement, reward, or object or item of value, offered to an individual in order to gain a commercial, contractual, regulatory, or personal advantage. It is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and accepts it, that individual will be breaking the law.

Bribery is illegal. No person to whom this policy applies shall engage in any form of bribery, whether it be directly, passively, or through a third party. They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree.

## **What is and is not acceptable?**

LFT accepts that normal and appropriate gestures of hospitality and goodwill, whether given to or received from third parties, are acceptable so long as the giving or receiving complies with the law and meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given to give to LFT a business advantage or with an expectation of a return favour;
- It is in compliance with local law;
- It is given in the name of LFT, not in an individual's name;
- It does not include cash or cash equivalent;
- It is appropriate for the circumstances (e.g. a small Christmas or celebratory gift, or a thank you present);
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift;
- It is given/received openly, not secretly;
- It is not given selectively to a key and influential person, with the clear intention of influencing that person;
- It is not in excess of a reasonable amount;
- It is not offered to, or accepted from, a politician, political party, or a government official or representative.

## **Facilitation Payments and Kickbacks**

LFT does not accept and will not make any form of facilitation payment or kickback of any nature. Such payments involve expediting or facilitating the performance of a public official for a routine governmental action. They tend to be made to low level officials with the intention of securing or speeding up the performance of duties or actions. LFT recognises that facilitation payments and kickbacks are a form of bribery.

## **Political Contributions**

LFT will not make donations, whether in cash, kind, or by any other means, to support any political party or candidate. LFT recognises that such action may be perceived as an attempt to gain an improper business advantage.

## **Monitoring and reviewing**

The Trustees of LFT will review this policy and the implementation of it on a regular basis. They will re-assess its suitability, adequacy and effectiveness.

Approved by the Trustees on 7 January 2020.



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Sarah Branquinho  
Chair