

Scottish Women's Football (SWF)

ANTI-BRIBERY AND CORRUPTION POLICY ("Policy")

Scottish Women's Football (SWF) seeks to run its business with integrity and to uphold the highest standards. As an Affiliated National Association (ANA) to the Scottish FA we recognise the role we have to play in ensuring our sport remains untainted by bribery or corruption.

Corruption and bribery are damaging to society and pose huge reputational risk to the good and fair perception of our sport. They divert money and other resources from those who need them most, hindering economic and social development and adversely impacting legitimate business.

This Policy seeks to set out efforts and actions to guard against bribery and corruption and requires the efforts and vigilance of individuals and the whole of SWF to ensure the policy's intent is realised.

In this policy, "we", "us", and the "company" means Scottish Women's Football.

SWF Board

April, 2023

INTRODUCTION

This Policy sets out the steps all of us must take to prevent bribery and corruption in our business and to comply with the relevant legislation and SWF's requirements. The Policy applies to the following: employees, (full-time, part-time, temporary), Directors, consultants, agents, co-optees, league management committee members, ("Associated Persons").

What are bribery and corruption?

Corruption is the misuse of office or power for private gain.

Bribery is a form of corruption. It means:- giving or receiving money, gifts, meals, entertainment or anything else of value:

- As an inducement to a person to undertake an improper performance of a function or duty;
- In the course of doing business.

In other words, bribery is designed to make a person act wrongly to secure an advantage for the giver.

Who can be involved in bribery and in what circumstances?

Bribery and corruption may be committed by:

- Employees, Directors, Committee members and appointees
- anyone they authorise to do things their behalf
- by representatives and other third parties acting on their behalf;
- our suppliers;
- even our customers (they might try to induce one of our people to give them more favourable terms).

Bribery can occur in both the public and private sectors. The person receiving the bribe is usually in a position to influence the award or progress of business, often a government or other public official.

The Legal Position on Bribery

Bribery and corruption are criminal offences in most countries where we do business. United Kingdom incorporated companies are subject to the Bribery Act 2010. Under the Act, it is illegal:-

- to pay or offer to pay a bribe;
- to receive or agree to receive a bribe;
- to bribe a foreign public official;
- for a commercial organisation to fail to prevent bribery unless it can demonstrate it has adequate procedures in place to prevent bribery.

It does not matter whether the bribery occurs in the United Kingdom or abroad. A corrupt act committed abroad may well result in a prosecution in the United Kingdom and/or the country which has similar legislation. Nor does it matter whether the act is done directly or indirectly.

SWF's position on bribery

Scottish Women's Football seeks to conduct its business to the highest legal and ethical standards. SWF will not be party to corruption or bribery in any form. Such acts damage SWF's reputation and exposes SWF, and Associated Persons, to the risks of fines and imprisonment. SWF takes a zero tolerance approach to bribery and corruption in respect of individuals associated with SWF and its third party representatives.

Risks of not acting with integrity

Involvement in bribery or corruption carries many risks. Among them are:

- a company which pays – or accepts – bribes is not in control of its business and is at risk of blackmail

The UK Bribery Act is one of the widest ranging pieces of legislation in the field. It covers any corrupt act by a UK company wherever it occurs:

- if a company is found guilty of bribery – or even of failing to have adequate procedures in place to prevent the bribery – it will be subject to large fines;
- any person found guilty of bribery will be subject to fines and/or imprisonment (up to 10 years under the Bribery Act);
- a public exposure, or even allegation, of bribery would entail severe reputational damage;
- good people will not want to work or be associated with SWF

Benefits of Integrity

Equally, there are very clear benefits to acting with propriety. These include:-

- parties with whom the SWF deals may not be able to deal with SWF unless it has an effective anti-bribery programme in place;
- SWF remains in good standing with its bank and its suppliers will want to keep doing business with it;
- a business with high ethical standards is a good place to work. It promotes clear communication and lets SWF act with confidence.

What are indicators of bribery?

Common indicators of corruption include those listed below. There may well be others. For example:-

- if payments are for abnormal amounts (e.g. commission), or made in an unusual way e.g. what would normally be a single payment is made in stages, through a bank account never previously used, or in a currency or via a country which has no connection with the transaction;
- process is bypassed for approval or sign off of terms or submission of tender documents, payments or other commercial matters;
- those whose job it is to monitor commercial processes is prevented from or hindered in doing so;
- individuals are secretive about certain matters or relationships and/or insist on dealing with them personally. They may make trips at short notice without explanation, or have a more lavish lifestyle than expected;
- decisions are taken for which there is no clear rationale;
- records are incomplete or missing.

Who is responsible for this policy?

The Chief Executive has overall responsibility for this Policy. Senior Managers have responsibility for their teams and to play the necessary leadership role they are entrusted with for the good of the organisation. The Board are also tasked with ensuring the business acts with integrity.

Areas of specific risk

Certain areas of business are often at higher risk than others. These include:-

- **Gifts and hospitality:** any gift presented to you should be declared with your line manager where they, in conjunction with the Chief Executive, shall determine if it needs to be declared or further action taken (anything valued at over £50 will require to be registered and approved). An inventory will be kept on all gifts.
- **Facilitation payments:** these are also known as “grease” payments.
- **Third parties:** SWF uses external parties to help it achieve its business objectives. Whilst that use is important, and in some cases essential, it can involve significant risk which staff/SWF appointees should be cognisant of.
- **Political contributions:** SWF does not make donations to political parties. No individual is to make a donation stated to be, or which would be taken to be, on SWF’s behalf without the prior approval of the Chief Executive. Political donations can be made in a personal capacity but please be sensitive as to how such contributions could be perceived, especially by those who are aware of your connection with SWF;
- **Charitable donations:** any charitable donations must be approved by the Board. Whilst individuals may, of course, make personal donations to charity they should not do so on behalf of SWF without the prior approval from the Board;
- **Local Circumstances:** SWF understands that different parts of the world have different social and cultural customs. This does not affect SWF’s stand that it does not pay or accept bribes or act corruptly. However, subject to that position, SWF understands the need to be sensitive to local customs. For example, there are cultures in which refusing (or even failing to offer) a gift is

considered impolite and could alienate a key contact. In such cases please refer to your line manager;

- **Exceptional Circumstances:** in some circumstances a payment is justifiable. In such cases, however, your line manager must be contacted as soon as possible regarding the payment; and the circumstances in which it was made must be fully documented and reported to the Chief Executive immediately. Consider carefully whether to involve the police. If, on consideration, this appears to be the best course of action, always consult the Chief Executive.

Such cases will be rare. Anyone visiting regions where they are more common should familiarise themselves, prior to travel, with current guidance relating to those countries. The Chief Executive or Board should be consulted if in doubt.

Risk Assessment

Risk in SWF's business will vary. The Chief Executive is responsible for assessing the level of risk and putting in place any measures additional to those outlined in this Policy which they consider are required.

Records

It is essential that SWF keeps full and accurate records of all its financial dealings. Transparency is vital. Also misleading records could be very damaging to SWF. Any financial irregularities are obliged to be reported.

Monitoring

All Associated Persons must observe this policy. The Policy will be monitored regularly to make sure it is being adhered to and it is the responsibility of all to help in this process.

Your responsibility

Each Associated Person is responsible:-

- For reading and knowing the contents of this Policy;
- For keeping full and accurate records of all cases where bribery is suspected;
- For reporting cases where you know, or have reasonable suspicion, that bribery has occurred or is likely to occur.

What do you do if you think something is wrong?

Each Associated Person has a responsibility to speak out if anything corrupt or otherwise improper occurring in relation to SWF's business is discovered. If you discover or suspect corruption, whether:-

- Another Associated Person;
- By a third party who represents SWF
- By one of SWF's suppliers/competitors;

- Or by anyone else

Please report it to your line manager as soon as possible. SWF will investigate all allegations of corruption immediately.

Conclusion

SWF takes this Policy very seriously. SWF's reputation comes from the way it acts. Anyone who pays bribes on SWF's behalf may be subject to disciplinary action.

If in doubt about anything in this policy, please do not hesitate to contact your line manager or the Chief Executive.