



Farmstrong Scotland

Anti-Corruption and Bribery Policy

May 2025

Contents

1	About this Policy	3
2	Definitions.....	3
3	Gifts and Hospitality.....	3
4	Record-keeping	5
5	How to raise a concern	5
6	Policy Dissemination	5
7	Breach of this Policy.....	5

About this Policy

Farmstrong Scotland is committed to conducting all its charity business and relationships in an honest and ethical manner. The Charity & its office bearers take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our charity business dealings and relationships.

Definitions

- a. Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or is improper in any way. Bribes can take many forms and can include money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit improperly or inappropriately gained.
- b. Bribery includes offering, promising, giving, accepting, or seeking a bribe.
- c. All forms of bribery are prohibited. If you are unsure about whether a particular act constitutes bribery, it should be raised with one of the following: Farmstrong Scotland's Programme Director, Farmstrong Scotland's Chair of Trustees, or a current Charity Trustee.
- d. Payments, gifts hospitality, or other benefits should not be given or received in the expectation of a charity business advantage, or any other advantage being given.
- e. Farmstrong Scotland and those acting on behalf of Farmstrong Scotland will not accept any offer from a third party that is known, or suspected being made with the expectation of a charity business advantage.
- f. Farmstrong Scotland and those acting on behalf of Farmstrong Scotland will not give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.
- g. Farmstrong Scotland and those acting on behalf of Farmstrong Scotland will not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts and Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining The Charity's standing or reputation, or marketing our products and services

- a. **Gifts, meals, entertainment and hospitality provided to others**
Meals, entertainment and hospitality for clients, suppliers, contractors or (subject to the additional provisions below under Special Rules for Government Officials & similar individuals) government officials must support Farmstrong Scotland's legitimate charity business interests – for example to improve actual and prospective clients' knowledge and awareness of the services Farmstrong Scotland offers or to establish a better working relationship – and should be reasonable and proportionate and not exceed what is acceptable under local custom. In this respect:
 - the cost per attendee at a meal (inclusive of drinks and any travel costs) on any one occasion should be no more than £125 and no more than £500 on any one person per year.

- the cost per attendee at any entertainment or hospitality event (including any travel costs) on any one occasion should be no more than £250 and no more than £500 on any one person per year.

Gifts should be given to a client, government official, supplier or contractor only on appropriate occasions, such as religious celebrations or to mark special events. The maximums are £50 per gift per person, and £100 per person in any year. You should never give cash or cash equivalents.

All gifts, excluding Farmstrong branded resources less than £15 for government officials and similar individuals must be approved in writing in advance by The Charity's Trustee Board.

For any proposed gift, meal, entertainment or hospitality above these limits you need your Charity Board's advance approval in writing.

All gifts with a value of more than £50, meals where the value is more than £125 per head and entertainment or hospitality with a value of more than £250 per head must be recorded in The Charity's Gifts & Hospitality Register with details of the person giving and receiving and the value or description of the item. The Gifts & Hospitality Register must be checked in advance to ensure the annual limits are observed.

b. Accepting gifts, meals, entertainment and hospitality

Do not accept gifts, meals or entertainment, or any other favour, from clients, suppliers or contractors if doing so might compromise, or appear to compromise, your ability to make objective charity business decisions in the best interests of The Charity and its members.

The receipt of any gift over the value of £15 must be notified in writing, to The Charity's Trustee Board within three working days of receipt, stating the name of the giver, a description of the gift and an assessment of its value, the charity business relationship between the giver and the Company, and the personal relationship between the employee and the giver.

All gifts with a value of more than £50, or meals where the value is more than £125 per head and entertainment or hospitality with a value of more than £250 per head must be recorded in The Charity's Gifts & Hospitality Register with details of the person giving and receiving and the value or description of the item. The Gifts & Hospitality Register must be checked in advance to ensure the annual limits are observed.

- c. A gift or hospitality will not be appropriate, if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- d. Any Farmstrong Scotland promotional gifts of low value such as branded stationery, key rings etc, may be given to or accepted from existing customers, suppliers, and charity business partners.

Charity's Gifts & Hospitality Register

All hospitality or gifts given or received over and above the thresholds referred to above should be recorded in The Charity's Gifts & Hospitality Register.

How to raise a concern

If offered a bribe, or are asked to make one, or if it is suspected that bribery, corruption, or other breach of this policy has occurred or may occur, the Farmstrong Scotland's Programme Director or Farmstrong Scotland's Chair of Trustees must be notified. If deemed appropriate, the procedures set out in the Whistleblowing Policy can be followed.

Breach of this Policy

- a. Breach of this policy by The Charity's Trustees, staff or members may result in disciplinary action up to and including dismissal or termination of employment/membership/involvement with the Charity. Any individual or party suspected of committing a breach of this policy will be required to co-operate fully with any subsequent investigation.
- b. Potential breaches of this policy shall be dealt with by The Charity's trustee Board, in line with The Charity's Articles of Association, byelaws and policies.
- c. Any potential breaches of this policy by a third party working on behalf of The Charity will result in a review of that working agreement and could result in cessation of any such agreement.

Review & Monitoring

- a. Review: This policy will be reviewed at least annually or as required, to consider changes in legislation, guidance, and good practice.
- b. Monitoring: The Charity will monitor the implementation and effectiveness of this policy, seeking feedback and suggestions for improvement from volunteers, office bearers, staff, volunteers, and other stakeholders

Policy Dissemination

This anti-corruption and bullying policy will be made available to all Trustees, staff, volunteers, and stakeholders upon request or via Farmstrong Scotland website and will be communicated to relevant stakeholders as appropriate. By adhering to this Policy, Trustees, staff, volunteers and stakeholders contribute to the overall well-being and positive culture of the Farmstrong Scotland.

Approval and Revision History

- Approved by: Farmstrong Trustees
- Date of Approval: 21st May 2025
- Revision Date: by 21st May 2026