




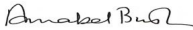


ANTI-BRIBERY AND CORRUPTION POLICY

Revision History

Version	Date	Editor	Summary of change

Approval

Name	Position	Signature	Date
S Mavroleon	Designated Safeguarding Trustee		14 Mar 2025
R Perkins	Chair of Trustees		29 June 2025
J Bush	Trustee		10 April 2025
A Bush	Trustee		10 April 2025

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I. Veterans Coastal Retreats, Anti-Bribery and Corruption

Purpose

The purpose of this Anti-Bribery Policy is to set out our commitment to prevent bribery and corruption in all forms, and to comply with the UK Bribery Act 2010 and Charity Commission regulatory guidance.

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of Veterans Coastal Retreats (VCR). Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Policy Statement

Veterans Coastal Retreats is committed to conducting all of its activities with integrity, honesty, and transparency, and to ensuring that all of its activities are free from bribery and corruption.

Prohibited Conduct

The following conduct is strictly prohibited and will not be tolerated under any circumstances:

- Offering, promising, giving, requesting, agreeing, receiving or accepting any bribe or other form of improper inducement, whether financial or non-financial, to or from any person or organization, for the purpose of gaining any commercial, contractual, regulatory, or personal advantage.
- Engaging in any conduct that could constitute an offense under the UK Bribery Act 2010, or any other applicable anti-bribery or anti-corruption laws.
- Making any facilitation payments, which are small payments made to secure or expedite routine government action, such as obtaining a permit or processing official documents.
- Failing to disclose any actual or suspected bribery or corruption to VCR's board of trustees or, where necessary, to the appropriate authorities.
- Retaliating or threatening retaliation against any individual who reports a suspected violation of this policy, or who refuses to engage in any conduct that could violate this policy.
- Any conflict of interest or self-dealing transaction that may harm Veterans Coastal Retreats.

Gifts, Hospitality and Donations

Veterans Coastal Retreats recognises that giving and receiving donations, hospitality and gifts are an established part of building relationships, promoting goodwill, raising charity funds and raising the reputation of the charity. However, it is important that these are

managed appropriately to ensure that they do not compromise the integrity and reputation of VCR. The following rules must be adhered to:

Gifts, hospitality and donations must only be offered when reasonable and necessary to conduct the charity's business. These must not be offered or accepted if doing so might reasonably be seen as an attempt to influence decisions, or if these are excessive or inappropriate.

All gifts, hospitality and donations given to VCR personnel rather than directly to the charity funds must be recorded and approved by the VCR board of trustees.

Veterans Coastal Retreats and our personnel must not accept donations from sources that are known or suspected to be involved in bribery or corruption.

Due Diligence

The Charity is committed to conducting due diligence on all third-party representatives, such as contractors and suppliers, to ensure that they are reputable and comply with all applicable anti-bribery and anti-corruption laws and regulations.

Responsibilities

All trustees, employees, volunteers, contractors, and third-party representatives of VCR are responsible for:

Familiarising themselves with and complying with this policy, as well as all applicable anti-bribery and anti-corruption laws and regulations.

Reporting any actual or suspected bribery or corruption to VCR's board of trustees or, where necessary, to the appropriate authorities.

Seeking guidance and advice from VCR's board of trustees if they are unsure about whether any conduct may be in violation of this policy.

Training and Communication

Veterans Coastal Retreats will provide appropriate training and communication to ensure that all trustees, employees, volunteers, contractors, and third-party representatives of the Charity are aware of and understand their obligations under this policy and the UK Bribery Act 2010 and Charity Commission regulatory guidance.

Monitoring and Enforcement

Veterans Coastal Retreats will monitor compliance with this policy and investigate any suspected violations. Violations of this policy may result in disciplinary action, up to and including termination of employment or other contracts, and referral to the appropriate authorities.

Regulatory Guidance

Further guidance can be obtained at the following links.

Gov.UK

- [Your responsibilities under money laundering supervision](#)
- [Anti Bribery Policy](#)

Charity Commission.

- [Know your donor key questions.](#)
- [Know your partner, key issues to think about.](#)
- [Know you donor – checklist.](#)
- [Protecting charities from harm – compliance toolkit.](#)
- [Advice on suspect donations.](#)
- [Donations from outside the UK.](#)
- [End use of funds.](#)
- [Designated persons list.](#)
- [Tainted donations.](#)

OFSI

- [OFSI Charity Sector Guidance on Sanctions.](#)
- [UK Sanctions Guidance.](#)
- [UK Sanctions List](#)