

# ANTI-BRIBERY POLICY

**A bribe is offering, promising or providing someone with a financial or other advantage to encourage that person to perform their functions or activities improperly in order to get business, keep business or gain a business advantage for the NHBF, or to reward that person for having already done so.**

**You must not:**

- Give a payment, gift or hospitality with the expectation that a business advantage will be received; or to reward a business advantage already given
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or that a business advantage will be provided by you or the NHBF in return

Third parties include people who perform services for you in business (or who you perform services for) such as members or potential members, industry bodies, suppliers, manufacturers, agents or others within the hair and beauty industry.

Under the UK Bribery Act 2010 bribery is punishable for individuals by up to 10 years imprisonment and if NHBF is found to have taken part in corruption we could face an unlimited fine and damage to our reputation.

## HOSPITALITY

This policy does not apply to appropriate hospitality given or received from third parties to enhance relationships as long as:

- It is not made with the intention of influencing you to give or receive a business advantage or to reward you for having done so
- It does not include cash or a cash equivalent such as vouchers
- It is appropriate in the circumstances (eg a small gift at Christmas time, corporate event)
- It is given openly (ie not in secret)
- The gift or hospitality is considered proportionate and reasonable and does not give rise to any conflict of interest regarding your role at NHBF

All gifts with a value of £100 or more must be notified to the Chief Executive (for inclusion in the monthly Board report which goes to the NHBF Board).

### Employees only

Invitations from third parties to hospitality events must be approved in advance. Where there is no direct business benefit to attending a hospitality event, the individual may attend but must take annual leave (or time off in lieu) to do so.