

<b>Club:</b>	Bexley Tigers Basketball Club
<b>Governing Body:</b>	Basketball England
<b>Policy Version:</b>	2.0
<b>Date Adopted:</b>	April 2026
<b>Review Date:</b>	April 2027
<b>Approved by:</b>	Club Committee
<b>Legislation:</b>	Bribery Act 2010

## 1. Introduction

Bexley Tigers Basketball Club ("the Club") is committed to conducting all its activities in an honest and ethical manner. The Club takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly, and with the utmost integrity in all its dealings and relationships, in accordance with the Bribery Act 2010.

This policy applies to all individuals connected with the Club, including committee members, coaches, volunteers, staff, contractors, and anyone acting on the Club's behalf. All individuals to whom this policy applies are required to read, understand, and comply with it.

## 2. Scope of Policy

This policy covers all activities of the Club, including but not limited to:

- Decisions made by the Club Committee or Management Board
- Procurement of goods and services
- Relationships with sponsors, partners, and third parties
- Grant applications and funding arrangements
- Engagement with Basketball England and other governing bodies

The Club must comply with the Bribery Act 2010, which makes it a criminal offence to offer, promise, give, request, or accept a bribe. The Club also has a corporate offence responsibility to prevent those associated with it from committing bribery.

## 3. The Offences of Bribery

Under the Bribery Act 2010, the following conduct is prohibited:

- Offering, promising, or giving a financial or other advantage to another person intending to induce them to perform a function improperly, or as a reward for doing so
- Requesting, agreeing to receive, or accepting a financial or other advantage as a reward for performing a function improperly
- Bribing a public or government official

The Club may be liable if a person associated with it commits bribery for the Club's benefit, unless the Club can demonstrate it had "adequate procedures" in place to

prevent such conduct. Penalties under the Bribery Act include unlimited fines for the Club and up to ten years' imprisonment for individuals.

## **4. Gifts and Hospitality**

The acceptance or giving of modest gifts and hospitality is acceptable only if it meets all of the following criteria:

- It is not offered with the intention of influencing a decision or obtaining a business advantage
- It complies with UK law
- It does not include cash or cash equivalents
- It is of a reasonable and proportionate value
- It is given openly and recorded

Gifts or hospitality that create a conflict of interest, or that appear to do so, must be declined and reported to the Club Chair.

## **5. Red Flag Scenarios**

All individuals should be alert to the following indicators of potential bribery:

- Requests for unusual or cash payments
- Unjustified commission or fees requested before a service is agreed
- Requests to overlook legal obligations
- Unusually generous gifts or hospitality from suppliers or partners
- Unexplained third-party payments or split invoices

## **6. Responsibilities**

The Club Committee has overall responsibility for this policy and for ensuring compliance across all Club activities. All individuals associated with the Club share responsibility for reporting concerns.

Concerns should be reported immediately to the Club Chair or, where that is inappropriate, to the Club Secretary.

## **7. Reporting a Concern**

Any individual who has a concern about bribery or corruption should report it as soon as possible to:

- Club Chair: Sten Mayunga
- Email: [complaint@bexleytigers.co.uk](mailto:complaint@bexleytigers.co.uk)

Reports can be made anonymously. The Club will take all concerns seriously and investigate promptly. Individuals who report concerns in good faith will not face any detriment as a result.

## **8. Breaches of this Policy**

Any breach of this policy will be treated as a serious matter and may result in disciplinary action, up to and including termination of membership, coaching role, or contractual relationship with the Club.

## **9. Monitoring and Review**

This policy will be reviewed annually by the Club Committee and updated as required to reflect changes in legislation or best practice. All updates will be communicated to relevant individuals.