



## Guardian Ballers CIC Anti-Bribery Policy

Initially approved by board: September 2024  
Review: Annually  
Review by/date: TH (director), HJ (Operations Manager), August 2025  
Next review date: August 2026

### 1. Purpose and Scope

Guardian Ballers is committed to conducting business ethically and in compliance with all applicable laws, including the UK Bribery Act 2010. This policy applies to all employees, volunteers, trustees, partners, agents, consultants, contractors, and any other people or bodies associated with Guardian Ballers.

### 2. Definition of Bribery

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action. It is illegal and a breach of trust. This includes facilitation payments, which are also considered bribes under the UK Bribery Act.

### 3. Prohibition of Bribery

Guardian Ballers has a zero-tolerance approach to bribery. Employees and associated persons are prohibited from offering, giving, soliciting, or accepting any bribe, whether cash or other inducement, to or from any person or organisation.

### 4. Key Risk Areas

- Gifts and hospitality
- Facilitation payments
- Political contributions
- Charitable donations
- Sponsorships
- Third-party relationships (agents, suppliers, contractors)

## 5. Procedures for Prevention

### Due Diligence

Guardian Ballers will conduct risk-based due diligence on third parties who perform services for or on behalf of the organisation.

### Risk Assessments

Regular risk assessments will be conducted to identify and mitigate bribery risks.

### Training

All employees and relevant associated persons will receive regular, comprehensive anti-bribery training.

### Financial Controls

Clear financial controls will be implemented to prevent and detect bribery.

### Monitoring and Review

Anti-bribery procedures will be regularly monitored and reviewed for effectiveness.

## 6. Responsibilities

All employees and associated persons are responsible for prevention, detection, and reporting of bribery. The Board of Trustees and senior management are responsible for ensuring this policy is understood and followed throughout the organisation.

## 7. Reporting Concerns

Employees should report any concerns or suspicions of bribery to their immediate line manager. If this is not appropriate, reports should be made to the designated Anti-Bribery Officer or through the confidential whistleblowing process. Guardian Ballers assures that there will be no retaliation for reports made in good faith.

## 8. Consequences of Non-Compliance

Bribery is a criminal offense that can lead to fines and imprisonment. For Guardian Ballers, it can result in unlimited fines, severe reputational damage, and potential debarment from public sector contracts. Employees found in breach of this policy may face disciplinary action, including dismissal for gross misconduct.

## 9. Gifts and Hospitality

Guardian Ballers recognizes that gifts and hospitality can be part of building business relationships. However, all gifts and hospitality must be reasonable, proportionate, and properly recorded. Any gift or hospitality exceeding £100 in value must be approved by a senior manager and recorded in the gifts and hospitality register.



Guardian Ballers CIC,  
47A Parkside, Coventry,  
CV1 2HG



[guardianballers.org](https://guardianballers.org)



[hello@guardianballers.org](mailto:hello@guardianballers.org)

Non-profit, Community-  
Interest-Company (CIC),  
Registered: 14041987

#### 10. Third-Party Relationships

Guardian Ballers will communicate its anti-bribery policy to all third parties at the outset of the business relationship and as appropriate thereafter. Contracts with third parties will reference this anti-bribery policy.

#### 11. Record Keeping

Accurate books and records must be maintained for all transactions. False, misleading, or artificial entries in the organisation's books and records are strictly prohibited.

#### 12. Communication

This policy will be communicated to all employees and relevant associated persons. It will be published on the organisation's website and intranet.

#### 13. Monitoring and Review

The Board of Trustees will monitor the effectiveness and review the implementation of this policy annually, considering its suitability, adequacy, and effectiveness



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## APPENDIX

### GIFTS AND HOSPITALITY REGISTER for GUARDIAN BALLERS CIC

Date Gift Presented	Description of Gift	Estimated Value*	Given By/To (Names of Donor and Recipient)	Approved by (Line Manager signature and date)

\* Only record gifts with values in excess of £100



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