

# CARGREEN YACHT CLUB LIMITED

Coombe Lane, Cargreen, Saltash, Cornwall PL12 6PB  
 A Company Limited by Guarantee. Registered in England and Wales.  
 Company No 5121798



## ANTI BRIBERY AND CORRUPTION POLICY

### 1. Introduction

Cargreen Yacht Club values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its affairs. The actions and conduct of the clubs directors, trustees, officers and managers as well as others acting on the club's behalf are key to maintaining these standards.

The purpose of this document is to set out the club's policy in relation to bribery and corruption. The policy applies strictly to all directors, trustees, officers, employees, managers, agents, consultants, contractors and to any other people or bodies associated with the club, within all regions, areas and functions.

### 2. Understanding and recognising bribery and corruption

Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest in the circumstances.

Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing or rewarding that person to act or for having acted in a way which a reasonable person would consider improper in the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.

Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision.

### 3. Penalties

The Bribery Act 2010 comes into force on 1 July 2011. Under that Act, bribery by individuals is punishable by up to ten years' imprisonment and/or an unlimited fine. If the club is found to have taken part in the bribery or is found to lack adequate procedures to prevent bribery, it too could also face an unlimited fine.

A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the club.

### 4. Cargreen Yacht Club Policy

The club will not tolerate bribery or corruption in any form.

The club prohibits the offering, giving, solicitation or the acceptance of any bribe or corrupt inducement, whether in cash or in any other form:

- to or from any person or company wherever located, whether a public official or public body, or a private person or company;

