

# Paddle UK Anti-Fraud, Anti-Corruption, Anti-Bribery & Sports Betting Policy

## 1. INTRODUCTION

- 1.1. Paddle UK<sup>1</sup> is committed to conducting business in an ethical and honest manner as well as implementing and enforcing systems that ensure fraud, bribery and corruption are prevented. Paddle UK has zero-tolerance for bribery and other corrupt activities. Wherever we operate, we are committed to acting professionally, fairly, and with integrity in all dealings and relationships.
- 1.2. Paddle UK will uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, with regards to our conduct both at home and abroad.

## 2. SCOPE OF POLICY

- 2.1. This policy applies to all employees of Paddle UK (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, athletes, coaches or any other person or persons associated with Paddle UK (including third parties), no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level. Together these persons are collectively referred to as Paddle UK Associates in this policy.
- 2.2. In the context of this policy, third-party refers to any individual or organisation Paddle UK interacts with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

## 3. DEFINITION OF BRIBERY

- 3.1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- 3.2. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- 3.3. Bribery is not limited to the act of offering a bribe. If an individual is offered and accepts a bribe then they are also breaking the law.

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<sup>1</sup> Paddle UK is a trading name of British Canoeing which is a Company registered at Companies House with the registered number 01525484.

#### **4. OFFERING AND ACCEPTING BRIBES**

- 4.1. Bribery is illegal. Paddle UK expressly prohibits any Paddle UK Associate as detailed in Clause 2.1, from engaging in any form of bribery, whether it be directly, passively, or through a third party (such as an agent or distributor). They must not bribe a domestic or foreign public official. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the Paddle UK Director of Governance.
- 4.2. The improper performance of a relevant function in anticipation of receiving financial or other advantage is also prohibited.
- 4.3. Paddle UK expects Paddle UK Associates to not only avoid, and be vigilant for, behaviours that contravene this policy, but to appreciate the broader professional need to avoid and resist participation in any situation that might create, for an onlooker, the appearance or perception of inappropriate influence or conflict of interest.

#### **5. HOSPITALITY AND BUSINESS GIFTS**

- 5.1. The Bribery Act 2010 does not seek to prohibit reasonable and proportionate hospitality, advertising, sponsorship and promotional or other similar business expenditure, as it is recognised that this constitutes an established and important part of doing business.
- 5.2. Further to Clause 5.1, Paddle UK accepts normal and appropriate gestures of hospitality and goodwill, whether given to or received from third parties, so long as the giving or receiving of gifts meets the following requirements:
  - 5.2.1. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
  - 5.2.2. It is not made with the suggestion that a return favour is expected.
  - 5.2.3. It is in compliance with local law.
  - 5.2.4. It is given in the name of the company, not in an individual's name.
  - 5.2.5. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
  - 5.2.6. It is appropriate for the circumstances (for example giving small gifts around Christmas or as a thank you for the completion of a project).
  - 5.2.7. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
  - 5.2.8. It is given/received openly, not secretly.
  - 5.2.9. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
  - 5.2.10. It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of Paddle UK's Director of Governance.

- 5.3. A record of all business gifts offered and received in excess of £100 and the reason for the gift should be retained in accordance with the provisions detailed in Clause 13.
- 5.4. A record of all hospitality offered and received in excess of £500 and the reason for the hospitality should be retained in accordance with the provisions detailed in Clause 13.
- 5.5. Quid pro quo arrangements (something that is given or taken in return for something else) are expressly prohibited.
- 5.6. Cash gifts are expressly prohibited.
- 5.7. The provision or acceptance of entertainment of a sexual or sexually suggestive nature is expressly prohibited.
- 5.8. It is not intended that modest meals with people with whom we do business - such as the provision or receipt of a modest lunch following a meeting - should fall within the scope of this policy.
- 5.9. It is not intended that the provision or receipt of modest promotional gifts such as pens, calendars, or similar items of low value, should fall within the scope of the policy.
- 5.10. Where it is inappropriate to decline the offer of a gift (for example when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Director of Governance, who will assess the circumstances.
- 5.11. Paddle UK recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
- 5.12. The intention behind a gift being given/received should always be considered. If there is any uncertainty, advice should be sought from the Director of Governance.
- 5.13. Line Managers reviewing expense claims should be alert to the provision of hospitality gifts that may constitute a bribe.

## **6. FACILITATION PAYMENTS**

- 6.1. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are commonplace in some foreign jurisdiction but they are regarded as bribes and are illegal under the Bribery Act 2010.
- 6.2. Paddle UK does not make, and will not accept, facilitation payments or “kickbacks” of any kind.
- 6.3. If a Paddle UK Associate is asked to make a payment on behalf of Paddle UK, they should always be mindful of what the payment is for and whether the amount

requested is proportionate to the goods or services provided. They should always ask for receipts and if they have any suspicions as to the true reasons behind a payment these should be raised with the Director of Governance.

- 6.4. Any Paddle UK Associate placed under pressure to make a facilitation payment should refer the matter to their senior manager or the Director of Governance immediately.

## 7. DONATIONS

- 7.1. Paddle UK expressly prohibits the giving of donations, whether in cash, kind, or by other means, to support any political parties or candidates, as well as prohibiting donations of any kind from UK Sport or Sport England grant funded income.
- 7.2. Any charitable donation must be consistent with Paddle UK's policy on charitable giving and be made with the knowledge and consent of the Senior Leadership Team.
- 7.3. Paddle UK expressly prohibits charitable donations where the purpose of the donation is secure an advantage or used to facilitate and conceal an act of bribery. All charitable donations must be made without the expectation of reward.

## 8. DEFINITION OF FRAUD AND CORRUPTION

- 8.1. Fraud is a wrongful or criminal deception intending to result in personal or financial gain. Paddle UK is subject to the Fraud Act 2006 which creates a general offence of fraud and introduces three ways of committing it, namely:

- Fraud by false representation;
- Fraud by failure to disclose information when there is a legal duty to do so; and
- Fraud by abuse of position.

- 8.2. In each case detailed in 8.1 above:

- the persons conduct must be dishonest;
- his/her intention must be to make a gain; or cause a loss or the risk of a loss to another.
- No gain or loss needs actually to have been made.
- The maximum sentence is 10 years' imprisonment.

Where the "person" in breach of the Fraud Act 2006 is a legal person (that is, a body corporate), those involved in its management who have consented to or connived in the offence are also guilty of the offence.

- 8.3. Corruption in the public sector can be defined as the abuse of power by an official (or any employee entrusted to carry out the functions of government, including contractors) for personal gain.

- 8.4. Paddle UK is committed to the prevention of fraud and corruption and to the promotion of a culture of integrity. We operate a zero-tolerance approach to fraud and corruption and require Paddle UK Associates to act honestly and with integrity at all times and to report all reasonable suspicions of fraud and/or corruption.
- 8.5. Paddle UK has a standalone Anti-Fraud Policy which details the preventative measures and reporting mechanisms we have put in place to prevent the chance of fraud occurring as well as ensuring the development of an ethical culture.
- 8.6. All instances of actual, attempted and suspected fraud and/ or corruption will be investigated and perpetrators will be subject to disciplinary and/or legal action.
- 8.7. Any suspicion of fraud or corruption should be reported either the reporting processes outlined in the Paddle UK Anti-Fraud Policy or to the Director of Governance.

## **9. SPORTS BETTING**

- 9.1. All Paddle UK Associates must ensure they read and understand the Paddle UK Sports Betting Policy (see Appendix 1) and ensure they comply with this policy if they are Directly Involved with the Paddle UK performance department.
- 9.2. Directly Involved within the Paddle UK performance department is defined in the Paddle UK Sports Betting Policy (see Appendix 1).

## **10. REPORTING CONCERNS**

- 10.1. All Paddle UK Associates must ensure they read, understand and comply with this policy.
- 10.2. All Paddle UK Associates have a responsibility to prevent, detect and report all instances of bribery. Paddle UK Associates should therefore be alert to the possibility of bribery and avoid any activity that might lead to, or suggest, a breach of this policy.
- 10.3. Any Paddle UK Associate who has concerns regarding acts of potential acts of bribery should speak to their Senior Manager in the first instance. If the Senior Manager is unavailable, the concern involves the Senior Manager or the concern is sufficiently serious, they should contact the Director of Governance.
- 10.4. All reports will be treated as strictly confidential and Paddle UK Associates should refer to the Paddle UK Whistleblowing Policy for more detailed guidance on the process for concerns emanating from within the organisation.
- 10.5. Whilst individuals are encouraged to put their name to any disclosure, allegations raised anonymously may be investigated depending on the seriousness of the issues raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

## **11. PROTECTION**

- 11.1. Paddle UK aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be unfounded.
- 11.2. Paddle UK is committed to ensuring no one suffers any detrimental treatment as a result of refusing to partake in bribery or corruption, or because of reporting in good faith their suspicions. Detrimental treatment may include but is not limited to, dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

## **12. TRAINING**

- 12.1. All Paddle UK Associates will be signposted to this policy during the induction process to ensure that they understand both the policy and the procedures that are necessary to comply with it.
- 12.2. A copy of this policy will be published on the Paddle UK website, will be available on the company HR portal, and will be available on demand from the HR or Governance department.
- 12.3. Paddle UK's zero approach to fraud, bribery and corruption should be communicated to all suppliers, contractors and business partners, and any other relevant third parties at the outset of any fiduciary or business relationship, and as appropriate thereafter.

## **13. RECORD KEEPING**

- 13.1. Paddle UK will keep detailed and accurate financial records and will have in place appropriate internal controls which will evidence payments made and received and the business reason for these payments.
- 13.2. No accounts, invoices, or payments shall be kept "off the record" to facilitate or conceal improper payments.
- 13.3. In accordance with Clause 5.4 and 5.5, should a Paddle UK Associate be required to register a gift or hospitality, they should complete the Gift and Hospitality form and submit it to the Director of Governance who will maintain a centralised Register of Gifts and Hospitality. Any gift or hospitality received or given should be declared within 28 days and will be accounted for annually

## **14. MONITORING AND REVIEW**

- 14.1. The Director of Governance will monitor the effectiveness of this policy and review the implementation of it regularly considering its suitability, adequacy, and effectiveness.

- 14.2. This policy does not form part of any employment contract and it may be amended at any time so as to improve its effectiveness at combatting bribery and corruption.
- 14.3. Any changes made to this policy further to Clause 14.2 will be communicated to all Paddle UK associates by the HR manager or the Director of Governance.

## **15. SANCTIONS**

- 15.1. Paddle UK treats breaches of this policy with the upmost seriousness and will investigate any potential breach in accordance with the appropriate disciplinary policy/regulations. The severest internal sanction for a breach of this policy will be a summary dismissal for gross misconduct.
- 15.2. It should be noted that a breach of this policy is likely to involve criminal liability under the Bribery Act 2010 and Paddle UK reserves to right to make any necessary referrals or report to the authorities in this regard.

## APPENDIX 1

### PADDLE UK SPORTS BETTING POLICY

Legal and illegal betting on sports poses a risk to the integrity of sport through corrupt betting and associated activity. With smart phones and tablet devices it is very easy to access the internet and online gambling sites and place bets on the outcome or on certain aspect(s) of paddlesport.

As a National Governing Body, we are privy to information that could be used for private gain particularly through betting. This applies to athletes, coaches, employees, staff and volunteer workers and those appointed to represent Paddle UK. Sports betting activity has increased across all sports and disciplines. It is essential that such activity does not take place in a manner which has the potential to compromise the authenticity of sporting conduct and sporting results.

#### Definitions

<b>“Inside Information”</b>	means any information, which is not Publically Known that would materially affect peoples’ expectations relating to the participation in, or the likely or actual outcome of a sporting competition or event. Such information includes, but is not limited to, factual information regarding the competitors, the conditions, tactical considerations, injuries, or any other aspect of the sporting competition or event.
<b>“Publically Known”</b>	means any information that is already published as a matter of public record, able to be readily acquired by an interested member of the public or disclosed according to the rules and regulations governing the relevant sporting competition or event. It is your responsibility to determine whether information which you have access to falls under the definition of “Inside Information”. You are advised to err on the side of caution. You should also seek advice from your Line Manager or the Governance Team.
<b>“Directly Involved”</b>	means a funded athlete or a member of staff who through their role has access to Inside Information.

1. If you are “Directly Involved” within the Paddle UK performance department you cannot:
  - 1.1. bet on paddlesport, anywhere in the world;
  - 1.2. ask someone to bet on your behalf on paddlesport anywhere in the world;
  - 1.3. share any “Inside Information” with anyone including but not limited to your partner, civil partner, spouse, cohabitee or dependent children which could enable them to gain an advantage through corrupt betting activity;



- 1.4. become involved in any other activity associated with corrupt betting which could reasonably be deemed as suspicious and detrimental to the image and reputation of Paddle UK and the sport.
2. The following acts are also prohibited:
  - 2.1. fixing a race or attempting to fix a race;
  - 2.2. benefiting from a participant failing to perform;
  - 2.3. soliciting, inducing, encouraging, offering (or attempting to offer) a bribe to any other party to do any of the above offences;
  - 2.4. receiving, seeking a bribe (or attempting to receive or seek a bribe) in order to fix a race or attempt to fix a race;
  - 2.5. destruction of evidence in relation to a potential breach; and
  - 2.6. failing to report suspicions or approaches or disclosure of information.
3. Criminal offence of cheating - Section 42 of The Gambling Act 2005 created an offence of "cheating at gambling" which would include cheating in sports influenced by betting involvement. This may result in the imposition of severe penalties (fines and jail) for individuals. We may refer any matter to the Gambling Commission for consideration of an investigation for the criminal offence of cheating at gambling.