BBC

Anti-Bribery Policy

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1. ANTI-BRIBERY POLICY STATEMENT

1.1 The BBC is committed to conducting business in accordance with the highest ethical and legal standards. The integrity of our staff, and those with whom we do business, is critical to our success. Our audiences and stakeholders have every right to expect that professional, competent and trustworthy people are working in the best interests of the BBC. The BBC Trust, as the

advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. WHO IS COVERED BY THE POLICY?

2.1 Under Section 7 of the Bribery Act the BBC may be liable to be prosecuted for

accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

A fixer which you have booked makes an additional payment to a foreign official to speed up the issuing of a registration licence for a local branch in a remote African country. There is no official process for speeding up the issuing of a licence in the country.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for the BBC. The BBC itself may also be found to have committed an offence, if it has failed to prevent such occurrences negligently.

	approval of your line manager	Legal and Business Affairs representative.

4.3 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

5. GIFTS AND HOSPITALITY - WHAT IS NOT ACCEPTABLE?

It is not acceptable for you (or someone on your behalf) to:

(a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

(b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

(c) 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;

(d) accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;

(e) threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or

(f) engage in any activity that might lead to a breach of this policy.

6. FACILITATION PAYMENTS

6.1 Facilitation payments are typically small, unofficial payments made to secure or expedite a routine or necessary government action by a government official, when we have already paid for, or are entitled to, that action. They are not commonly requested in the UK, but this is a widespread form of bribery, despite being illegal in almost every country in which we operate. Under Sections 1 and 6 of the Bribery Act 2010, bribes and facilitation payments are illegal and the offer of any of these forms of payments in any of the countries in which we operate is against BBC policy.

10.2 It is important that you tell your line manager or your legal and business affairs representative as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are affected by any another form of unlawful activity.

11. PROTECTION

11.1 Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

11.2 The BBC is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

13. WHO IS RESPONSIBLE FOR THE POLICY?

13.1 The Executive Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Managing Director (BBC Finance & Operations) is the senior sponsor -Bribery Policy.

13.2 The Divisional Directors have primary and day-to-day responsibility for implementing this Policy, and for monitoring its use and effectiveness. The Group General Counsel has primary responsibility for dealing with any queries on its interpretation. BBC management at all levels are responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

14. MONITORING AND REVIEW

14.1 The effectiveness of the implementation of this Policy will be reviewed and monitored regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal

(l) you notice that we have been invoiced for a commission or fee