

ANTI-BRIBERY STATEMENT

Purpose

The Veolia Environmental Trust is committed to conducting all of its affairs and relationships with others in an ethical and transparent manner. The Trust encourages ethical values and behaviours that are above and beyond compliance with applicable laws and regulations.

This statement outlines our approach to bribery and corruption, and our expectations of those we work with.

Application

This statement applies to all individuals and organisations that we work with, including, but not limited to, suppliers, grant applicants, funded projects, contractors, and partners

Our zero tolerance approach to bribery and corruption means that failure to comply with our requirements is likely to result in the termination of contracts, grants or orders.

Definition

A bribe is an inducement or reward offered, promised or given, in order to gain any commercial, contractual, regulatory or personal advantage. Acts of bribery or corruption are intended to influence the individual in the performance of their duty and induce them to act dishonestly. Bribes are not limited to cash and can include, although not limited to, hospitality, entertainment, etc.

The Bribery Act 2010 contains two general offences covering:

- the offering, promising or giving of a bribe (active bribery)
- the requesting, agreeing to receive or accepting of a bribe (passive bribery)

There is a further relevant offence which specifically addresses commercial bribery.

- An offence of failure by a commercial organisation to prevent a bribe (should an offence be committed it will be a defence that the organisation has adequate procedures in place to prevent bribery).

Our expectations

By entering into any relationship with the Trust, you accept responsibility for the prevention, detection, and reporting of bribery and other forms of corruption and similar unethical conduct.

Due diligence must always be exercised by suppliers, applicants and funded projects etc, to ensure that bribes are not taken, offered or given, directly or indirectly by individuals, companies and organisations that have any connection with the Trust.

In the same way that bribes are prohibited, it is unacceptable to turn a blind eye or allow any representatives, suppliers or applicants to offer or accept bribes

Reporting

Everyone connected with the Trust is required and encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If unsure whether a particular act constitutes or could constitute bribery or corruption, or if you have any other queries, these should be raised with the Head of Finance, Operations and Development - lorraine.womack@veolia.com
