



ANTI-BRIBERY POLICY

1. Introduction

The Shakespeare Globe Trust (and its subsidiaries) are committed to operating with integrity, transparency, and accountability. We have a zero-tolerance approach to bribery and corruption and will comply with all applicable anti-bribery laws, including the UK Bribery Act 2010.

This policy applies to all trustees, employees, volunteers, agency workers, contractors, external consultants, third-party representatives and partners.

2. Purpose

The purpose of this policy is to:

- Prevent bribery and corruption in all activities related to the organisation
- Ensure compliance with UK bribery laws and good governance standards
- Protect the reputation and financial integrity
- Provide clear guidelines on acceptable behaviour when dealing with partners, donors, and suppliers

3. What is Bribery?

Bribery is the offering, giving, requesting, or accepting of a financial or other advantage to improperly influence a decision or gain an unfair business advantage.

Examples of bribery:

- Offering money to a government official to speed up a grant approval
- Accepting expensive gifts or hospitality in exchange for awarding a contract
- Paying 'facilitation payments' to fast-track services

4. Prohibited Conduct

The Shakespeare Globe Trust strictly prohibits:

- Offering, promising, or giving bribes in any form
- Requesting or accepting bribes
- Making facilitation payments (small, unofficial payments to expedite services)
- Allowing third parties (consultants, contractors, suppliers) to engage in bribery on behalf of the charity

- Providing or accepting lavish gifts or hospitality intended to influence decision-making

5. Gifts, Hospitality and Donations

Gifts & Hospitality

Modest and proportionate gifts or hospitality may be accepted or given if they:

- Are not intended to influence a business decision
- Are recorded in the Gifts and Hospitality Register

Larger gifts/hospitality must be reported and approved as appropriate. Under no circumstances should any gifts or hospitality be accepted from any contractor or potential contractor. For further guidance please refer to Section 12 of the Finance Manual.

Donations

- The organisation doesn't accept donations linked to an expectation of favourable treatment
- Any suspected bribery linked to donation must be reported immediately

6. Responsibilities

Trustees & Directorate

- Ensure this policy is implemented and enforced
- Promote a culture of integrity within the organisation

Employees & Volunteers

- Read, understand, and comply with this policy
- Report any concerns or suspected bribery

Third Parties & Partners

- Expected to comply with our anti-bribery standards
- Contracts with suppliers should include an anti-bribery clause

7. Reporting and Whistleblowing

If you suspect bribery or corruption, report it immediately to:

- Either Chief Executive Officer, Finance Director, People Team or Treasurer
- Reports will be treated confidentially and investigated promptly
- We have a zero-retaliation policy for whistleblowers

8. Training and Monitoring

Periodic training on bribery prevention will be provided to staff and Trustees.

9. Breaches

Any employee who breaches this policy could face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

10. Other policies and procedures

This policy should be read in conjunction with:

- The People Handbook
- Finance Manual
- Fundraising Policy

Approved by the Board of Trustees on: 18 March 2025

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