

ScottishPower Foundation Anti-Bribery and Corruption Policy

ScottishPower Foundation (the “Foundation”) is committed to the highest standards of ethical conduct and integrity in its activities. The Foundation’s Anti Bribery and Corruption Policy (‘the Policy’) sets out the Foundation’s position on preventing and prohibiting bribery and corruption in accordance with the Bribery Act 2010 (“the Act”).

The Act came into force on 1 July 2011 and created a statutory framework of criminal offences namely:

- Bribery - giving, promising, and offering of a bribe;
- Being bribed - agreeing to receive or accept a bribe;
- Bribery of foreign public officials;
- Failure of a commercial organisation to prevent bribery on its behalf; and
- A senior officer of a commercial organisation consenting to or conniving in an act of bribery.

The Act can be viewed using the following link:

<http://www.legislation.gov.uk/ukpga/2010/23/contents?view=plain>

Policy Objective

The Policy sets out the key Anti- Bribery and Corruption principles which the Foundation is committed to.

Policy Scope

All Foundation trustees and personnel must comply with the Policy. The Policy applies such that the Foundation must have in place proportionate procedures to ensure that all projects comply with the terms of the Policy. It is essential that the Foundation conducts an effective process of due diligence prior to entering into significant business relationships and that the Foundation keeps a record of this process.

Any breach of the Policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned. Such a breach could result in serious damage being done to the reputation and standing of the Foundation. This is something that OSCR takes very seriously and places a large emphasis on charity trustees playing an active role in protecting the reputation of a charity.

Anti Bribery and Corruption Policy

The Foundation does not tolerate, permit or engage in bribery, corruption, or improper payments of any kind in its activities, either with public officials or with people in the private or third sector. Ethical behaviour is in the long term interests of the Foundation.

The Foundation is committed to the following key Anti Bribery and Corruption principles:

- We will carry out activities fairly, honestly and openly.
- We will not give or offer any money, gift, hospitality or other advantage to any person carrying out a business, charitable or public role, or to a third party associated with that person, to get them to do something improper.
- We will not give or offer any money, gift, hospitality or other advantages to any foreign public official with the intention of influencing them to our advantage.
- We will not use intermediaries or contractors for the purpose of committing acts of bribery.
- We do not allow personnel to accept money, gifts, hospitality or other advantages from associates, actual or potential projects, or service providers which are intended to influence a decision or transaction (including our assessment of any applications for support from the Foundation) in some improper way.
- We will avoid working with others who do not commit to conducting business or other activities without bribery.
- We will act in a way which protects the reputation of the Foundation. We will ensure that nothing is done which could give rise to any suspicion that the conduct of the Foundation has fallen in any way below standards of best practice or the expectations of the Office of the Scottish Charity Regulator.
- We are committed to a programme to counter the risk of the Foundation being involved in bribery. We will have adequate procedures in place to ensure that all personnel understand the implications of the Act and our procedures. We will have appropriate mechanisms in place to record any problems.

Further information and guidance

This policy set outs the key principles which the Foundation must adhere to. Further relevant information and guidance about this policy can be found in the **UK Ministry of Justice** website :

<http://www.justice.gov.uk/guidance/making-and-reviewing-the-law/bribery.htm>