

Anti-Fraud, Bribery & Corruption Policy

Policy Name	Anti-Fraud, Bribery and Corruption Policy
Executive Owner	Chief Financial Officer
Approval body	ELT
Frequency of approval	3 years
Date approved	October 2025
Date next approved	October 2028

Policy Statement

At Fight for Sight, we conduct business in an honest and ethical manner. As such, we take a zero-tolerance approach to fraud, bribery, corruption and money laundering, and we are committed to acting professionally, fairly and with integrity in all our dealings and relationships.

Scope

We will uphold all laws relevant to countering fraud, bribery and corruption. In particular the Bribery Act 2010, the Money Laundering Regulations 2017, the Proceeds of Crime Act 2002 and anti-terrorism laws.

We strive to ensure that our activities and processes are carried out and reported honestly, accurately, transparently and accountably and that all decisions are taken objectively and free of personal interest. We will not condone any behaviour that falls short of these principles.

This policy applies to all individuals working for or on behalf of Fight For Sight, including staff, consultants, contractors, agency workers, volunteers, trustees, committee members, and any other person who performs services for or on behalf of us.

Definitions

Fraud means a deliberate intent to acquire money or goods dishonestly through the falsification of records or documents. The criminal act is the attempt to deceive and is therefore treated as seriously as accomplished fraud.

Bribery means giving or receiving an unearned reward in order to influence someone's behaviour or obtain favourable treatment.

An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

Corruption - is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means.

Payment where used in this Policy may apply to any advantage whether this be financial, goods, services, access, promotion, unfair advantage or facilitation of any kind.

Money laundering is the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making them appear to have derived from a legitimate source.

Anti-Fraud Responsibilities

Trustees & ELT:

Trustees and ELT are responsible for overseeing a sound system of internal control that supports the achievement of our policies, aims and objectives.

The system of internal control is designed to respond to and manage the range of risks that we face. The system of internal control is based on an on-going process designed to identify the principal risks, to evaluate the nature and extent of those risks and to manage them effectively.

Managing fraud and money laundering is seen in the context of the management of this wider range of risks.

Chief Executive Officer (CEO):

Overall responsibility for managing the risk of fraud and money laundering has been delegated to the CEO. The day to day responsibility has been delegated to the Chief Financial Officer (CFO). The responsibilities include:

- Undertaking a regular review of the fraud and money laundering risks.
- Establishing an effective anti-fraud and money laundering response plan, in proportion to the level of fraud and money laundering risk identified.
- The design of an effective control environment to prevent fraud.

ELT:

ELT is responsible for:

- Conducting due diligence enquiries on significant new partners and donors to establish and verify their identity (see our Procurement Policy and Supplier Set Up and Change Policy for more details)
- Ensuring that an adequate system of internal control exists within their areas of responsibility and that controls operate effectively;
- Preventing and detecting fraud and money laundering as far as possible;
- Assessing the types of risk involved in the operations for which they are responsible;

- Ensuring that controls are being complied with and their systems continue to operate effectively; and
- Implementing new controls to reduce the risk of similar fraud and money laundering occurring where frauds have taken place.

Staff and Volunteers:

Every member of staff or volunteer is responsible for:

- Acting with propriety in the use of the charity's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers;
- Conducting themselves in accordance with the values and behaviour principles set out above;
- Being alert to the possibility that unusual events or transactions could be indicators of fraud;
- Alerting their manager (or responsible person in the case of volunteers) when they believe the opportunity for fraud and money laundering exists e.g. because of poor procedures or lack of effective oversight;
- Reporting details immediately if they suspect that a fraud and money laundering has been committed or see any suspicious acts or events; and
- Cooperating fully with whoever is conducting internal checks or reviews or fraud and money laundering investigations.

Bribery & Corruption

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

- 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.

- Give or accept a gift or hospitality during any business negotiations or tender process, if this could be perceived as intended or likely to influence the outcome.
- Accept a payment, gift or hospitality from a third party that an individual knows or suspects is offered with the expectation that Fight for Sight will provide an advantage for them or anyone else in return.
- Accept hospitality from a third party that is unduly lavish or extravagant under the circumstances.
- Offer or accept a gift to or from government officials or representatives, or politicians or political parties.
- Threaten or retaliate against another individual who has refused to commit a bribery offence or who has raised concerns under this policy.
- Engage in any other activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

We will not make or accept "kickbacks" of any kind. Kickbacks are typically payments made in return for a business favour or advantage. You must avoid any activity that might lead to a kickback being made or accepted.

Gifts, hospitality and expenses

The giving or accepting of gifts is allowed if the following is met:

- It is not made with the intention of influencing a third party to obtain an advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).

- It is appropriate in the circumstances, taking account of the reason for the gift, its timing and value. For example, small gifts given at Christmas.
- It is given openly, not secretly.
- It complies with any applicable law.
- Promotional gifts of low value (under £50) will usually be acceptable.

Reimbursing a third party's expenses, or accepting an offer to reimburse our expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable.

Record-keeping

We will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. You must declare and keep a written record of all hospitality or gifts given or received, which will be subject to managerial review. You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our Expenses Policy and record the reason for expenditure.

Reporting and how to raise a concern

You should notify your line manager as soon as possible if you believe or suspect that an instance of fraud, bribery, corruption or money laundering has occurred, or may occur in the future. If your line manager is not available or if you feel that it is not appropriate to engage your line manager then you should contact the CFO or another member of ELT. Please refer to the Whistleblowing Policy for further details.

You are encouraged to raise concerns about any issue or suspicion of fraud, bribery, corruption or money laundering at the earliest possible

stage. If you are approached to engage in fraud, bribery, corruption, or money laundering, or if you believe or suspect that any breach of this policy has occurred or may occur, you should report it in accordance with our Whistleblowing Policy as soon as possible.

Individuals who refuse to engage in fraud, bribery, corruption or money laundering, or 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.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in fraud, bribery, corruption or money laundering, or because of reporting in good faith their suspicion that an actual or potential offence has taken place, or may take place in the future. If you believe that you have suffered any such treatment, you should inform a member of ELT immediately. If the matter is not remedied, you should raise it formally in line with our Grievance Policy.

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate the relationship with other individuals and organisations working on our behalf if they breach this policy.