

CLTC Bribery and Corruption Policy

CLTC values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its affairs. The actions and conduct of our committee and members as well as others acting on our behalf are key to maintaining these standards.

We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implement and enforce effective systems to counter bribery.

The purpose of this policy is to:

- (a) set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
- (b) provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

What is not acceptable?

It is not acceptable for us (or someone on our behalf) to:

- (a) give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that an advantage to the Club will be received, or to reward an 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 or hope 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 an advantage to the Club 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.

Committee & Member Responsibilities

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of the Committee and all members of CLTC. All members are required to avoid any activity that might lead to, or suggest, a breach of this policy and report any concerns or suspicions that a breach of this policy has occurred or may occur in the future.

Any employee who breaches this policy will face disciplinary action under the club constitution and possible criminal prosecution.

Record-keeping

CLTC maintain financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties and record hospitality or gifts accepted or offered to employees.

Protection

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. CLTC aims 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.