



## COBCOE POLICY

### Policy Statement – Anti Bribery

COBCOE is dedicated to ensuring full compliance with all anti-bribery and corruption laws and regulations, including the Bribery Act 2010.

Its Anti-Bribery Policy extends to all the organisation's business dealings and transactions; in all countries in which it or its subsidiaries and associates operate.

An associate includes subcontractors and officers of the organisation.

COBCOE policy is that no employee; associate or agent shall pay bribes or offer improper inducements to anyone for any purpose, nor will we accept bribes or improper inducements.

COBCOE expects its employees and associates to demonstrate honesty; integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities

We require that all staff, including those permanently employed; temporary agency staff and contractors to:

- Act honestly and with integrity at all times and to safeguard the organisation's resources for which they are responsible
- Comply with the spirit; as well as the letter, of the laws and regulations of all jurisdictions in which COBCOE operates, in respect of the lawful and responsible conduct of activities.

The COBCOE Code of Practice (adopted April 2012 AGM) clearly sets out the standards expected from members of COBCOE, and specifically:

- A COBCOE member is expected to act ethically and with integrity at all times
- Neither the COBCOE member nor its officers shall be involved in any criminal or unethical activity (including without limitation bribery, any other type of corruption, fraud or money laundering) nor other activity likely to bring COBCOE, its members or the British Government into disrepute, but nothing shall preclude it taking reasoned positions either in favour of or opposing policies of the British or other governments.

COBCOE encourages full compliance amongst the larger collective membership of COBCOE chambers and their communities, specifically:

- Providing a platform for best practice exchange and knowledge transfer
- Providing a platform for Anti-Bribery training available to members of chambers via an on-line facility marketed by COBOCE and individual chambers across Europe (and via the BBW alliance, across the globe)