

EHA PROTECTING BUSINESS INTERESTS POLICY

Gifts, entertaining, conflicts of interests and bribes

Whilst engaged on the business of the EHA, employees are expressly prohibited from offering, promising or giving a bribe, or requesting, agreeing to receive or accepting a bribe, or bribing a foreign public official. Bribery is a criminal offence under the Bribery Act 2010 and it will not be tolerated under any circumstances. Breach of this provision constitutes a gross misconduct offence.

During their period of employment, employees will also:

- at all times and in all respects act in the best interests of the EHA and use their best endeavours to promote, develop and extend the EHA's business and interests,
- take all necessary steps to avoid conflicts of interest and to report to the EHA any possible conflict of interest,
- immediately disclose to the EHA any knowledge or suspicion they may have that they, or any other employee or officer of the EHA, has plans to commit a serious breach of duty or serious wrongdoing, or that they are not observing rules or procedures for the proper conduct of the EHA's business. For the avoidance of doubt this includes reporting their own wrongdoing,
- immediately disclose to the EHA any knowledge or suspicion they may have that they, or any other employee, officer or agent of the EHA, has plans to offer, promise or give a bribe or to request, agree to receive or accept a bribe or to bribe a foreign public official in connection with the business of the EHA contrary to the Bribery Act 2010 and for the avoidance of doubt this includes reporting their own wrongdoing. Such disclosures can be made under the terms of the EHA's public interest disclosure policy,
- report to the EHA any direct or indirect approaches that are made to them by any business that may be in direct or indirect competition with the EHA's business,
- report to the EHA any hospitality, gifts or personal services offered by a supplier or a client,
- not extend or receive any hospitality or entertainment without prior approval from their line manager, and
- not conduct personal business with suppliers or clients without prior approval from their line manager.