

Moving Mountains Anti-Bribery, Corruption, Gifts & Hospitality Policy

1. Purpose

Moving Mountains Trust is committed to conducting all of its activities honestly, fairly and with integrity.

The charity has a zero-tolerance approach to bribery and corruption and is committed to complying with the Bribery Act 2010 and other applicable laws. As a charity working with partner organisations in Kenya and Nepal, we recognise that customs regarding gifts and hospitality vary between cultures. This policy provides clear guidance to ensure that cultural practices do not compromise the charity's independence, integrity or reputation.

2. Scope

This policy applies to:

- Trustees
- Employees
- Volunteers
- Consultants
- Contractors
- Committee members
- Anyone acting on behalf of the charity
- Individuals representing the charity overseas

Partner organisations are expected to maintain standards consistent with this policy when managing funds or activities on behalf of the charity.

3. Policy Statement

The charity will never tolerate corruption in any form. No person acting on behalf of the charity shall:

- offer, promise or give a bribe;
- request, agree to receive or accept a bribe;
- use charity funds for improper payments;
- offer gifts or hospitality intended to influence decisions;
- misuse charitable resources for personal benefit.

4. Definitions

Bribery

Bribery means offering, giving, requesting or receiving something of value to influence a person's actions or decisions improperly.

A bribe may include:

- cash;
- gifts;
- hospitality;
- travel;
- accommodation;
- employment opportunities;
- favours;
- services;
- donations made to secure an improper advantage.

Corruption

Corruption is the abuse of entrusted power for private gain.

Examples include:

- kickbacks;
- secret commissions;
- fraudulent procurement;
- conflicts of interest that are deliberately concealed;
- falsifying invoices or financial records;
- misuse of grant funds.

5. Prohibited Conduct

No trustee, volunteer or representative of the charity may:

- make unofficial or improper payments;
- offer anything of value to influence decisions;
- accept personal benefits linked to charity business;
- misuse donor funds;
- conceal financial transactions;
- authorise payments without proper approval;
- create false accounting records.

6. Facilitation Payments

The charity prohibits facilitation payments.

These are unofficial payments made to secure or speed up routine actions by public officials.

If an individual is placed under immediate threat to their safety, they should prioritise their personal safety and report the incident to the Chair of Trustees as soon as possible.

7. Gifts and Hospitality

The charity recognises that modest gifts and hospitality may form part of normal business or cultural relationships.

However, gifts and hospitality must never influence, or appear to influence, decision-making.

Acceptable Gifts

The following may normally be accepted:

- inexpensive promotional items;
- modest refreshments;
- low-value cultural gifts received during official visits;
- hospitality that is reasonable and proportionate.

Where refusal of a modest gift would cause genuine cultural offence, particularly during visits to Kenya or Nepal, the gift may be accepted on behalf of the charity.

Unacceptable Gifts

The following must not be accepted:

- cash or cash equivalents;
- expensive personal gifts;
- luxury hospitality;
- gifts linked to funding or procurement decisions;
- gifts intended to influence decisions;
- repeated gifts from the same individual or organisation.

Giving Gifts

Gifts given on behalf of the charity should:

- be modest;
- be transparent;
- be appropriately authorised;
- never be intended to influence a decision;
- be accurately recorded where expenditure is incurred.

Hospitality

Reasonable hospitality may be offered or accepted where it:

- supports legitimate charity activities;
- is proportionate;
- is infrequent;
- does not influence decision-making.

Hospitality should never be excessive.

8. Recording Gifts

Any gift or hospitality accepted with an estimated value exceeding **£25** should be declared to the Chair and recorded in the charity's Gifts and Hospitality Register.

Where there is any doubt, the gift should be declared regardless of value.

The Board may choose to revise this threshold if appropriate to the charity's circumstances.

9. Procurement

Procurement decisions must always be based upon:

- value for money;
- fairness;
- transparency;
- the best interests of the charity.

No person involved in procurement may accept gifts or benefits from suppliers.

Any conflict of interest must be declared in accordance with the charity's Conflict of Interest Policy.

10. Overseas Operations

The charity works with NGO partners in Kenya and Nepal.

Trustees and volunteers should recognise that:

- customs regarding gifts and hospitality may differ;
- cultural expectations should be respected where appropriate;
- local customs must never override legal or ethical obligations.

Any concerns regarding bribery, corruption or improper payments involving overseas partners should be reported immediately.

The charity expects partner organisations receiving its funds to operate to equivalent standards of honesty, transparency and accountability.

11. Donations

The charity will not knowingly accept donations that:

- arise from criminal activity;
- are intended to influence the charity improperly;
- would damage the charity's reputation;
- create unacceptable conflicts of interest.

12. Reporting Concerns

Anyone who suspects bribery, corruption or financial misconduct should report the matter immediately.

Reports may be made under the charity's Whistleblowing Policy.

All reports will be treated seriously and investigated appropriately.

13. Responsibilities

Board of Trustees

The Board is responsible for:

- promoting an anti-corruption culture;
- ensuring effective financial oversight;
- investigating allegations appropriately;
- reviewing this policy periodically.

Trustees, Volunteers and Staff

All individuals must:

- comply with this policy;
- refuse improper payments or benefits;
- declare gifts where required;
- report suspected bribery or corruption promptly.

14. Breaches

Breaches of this policy may result in:

- removal from decision-making;
- disciplinary action (where applicable);
- termination of volunteer or consultancy arrangements;
- referral to statutory authorities where appropriate.

Serious financial misconduct may also be reported to the Charity Commission for Northern Ireland and, where necessary, to the Police Service of Northern Ireland or other relevant authorities.

15. Related Policies

This policy should be read alongside:

- Conflict of Interest Policy
- Financial Controls and Procurement Policy
- Whistleblowing Policy
- Code of Conduct
- Safeguarding Policy
- Data Protection and Privacy Policy

16. Monitoring and Review

The Board of Trustees will review this policy every two years, or earlier if legislation, CCNI guidance or the charity's activities change.

Appendix A – Gifts and Hospitality Register

The charity will maintain a register recording gifts and hospitality that are declared under this policy.

The register should include:

Date Recipient Donor Description Estimated Value Accepted/Declined Authorised By

The register should be reviewed periodically by the Board of Trustees.

Appendix B – Guidance for Trustees and Volunteers

Before accepting any gift or hospitality, ask yourself:

- Could this influence, or appear to influence, my judgement?
- Would I be comfortable if this was reported publicly?
- Is it connected to a funding, procurement or partnership decision?
- Have I declared it if required?
- Does accepting it protect the charity's reputation and independence?

If the answer to any of these questions is **No** or **Unsure**, the gift or hospitality should be declined or discussed with the Chair before acceptance.

- Fraud or financial misconduct
- Theft or misuse of charity funds
- Corruption or bribery
- Serious breaches of the charity's policies
- Abuse of authority