



# Anti-Bribery and Corruption Policy

## 1. Introduction

- 1.1 It is the policy of the Little Hoopers to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with the utmost integrity in all our business dealings and relationships.
- 1.2 The Little Hoopers will uphold all relevant bribery and corruption laws and is bound by the laws of the UK, including the Bribery Act 2010.

## 2. Scope of Policy

- 2.1 This policy applies to all employees, including temporary and contract workers, suppliers, sub-contractors and business partners and all will be provided with a copy (it will also be made available on the intranet).
- 2.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of everyone working for or with the Little Hoopers and all such people are required to avoid any activity that might lead to, or suggest, a breach of this policy.

## 3. The Offences of Bribery

- 3.1 Given the Little Hoopers is a UK company, the primary focus of the policy is offences under the UK Bribery Act 2010 (the "Bribery Act"), however it also addresses offences under the US Foreign Corrupt Practices Act 1977 (the "FCPA")
- 3.2 The Bribery Act makes it a criminal offence to bribe, or to offer or authorise a bribe to another person (including foreign official) or to be the recipient of a bribe and expressly prohibits the following conduct:
  - a. Offering, promising or giving a financial or other advantage to someone intending to induce them to perform a relevant function or activity improperly (including facilitation payments or where receipt of an advantage is itself improper), or to reward them for doing so;



- b. Requesting, agreeing to receive or accepting a financial or other advantage with a view to a relevant function or activity being performed improperly, or as a reward for improper performance, or where there is improper performance in anticipation of such an advantage; and
- c. Offering, promising or giving a financial or other advantage to a government official or to someone else at the government official's request or with their assent, intending to influence the official in their capacity as an official and intending to obtain or retain business or an advantage in the conduct of business for the Little Hoopers.

3.3 It is also a criminal offence for the Little Hoopers to fail to prevent bribery committed by a person "associated with" the Little Hoopers in the conduct of company business.

3.4 "Associated persons" can include employees, subsidiaries and third party agents, and anyone else who performs services for the Little Hoopers.

3.5 The only defence is to show that the Little Hoopers had "adequate procedures" to prevent the bribery from taking place.

3.6 Under the Bribery Act, all offences are punishable by unlimited fines for companies and individuals, and individuals can face up to ten years' imprisonment.

## 4. Example "Red Flag" Scenarios

4.1 During the course of your work you may come across certain 'red flag' behaviours. If you become aware of anyone being involved in any of the below situations, you must report it promptly to the Director of Legal Services:

- a. Engagement in, or an accusation of engagement in, improper business practices;
- b. Working with someone who has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation of having a "special relationship" with foreign government officials;



- c. A requirement of a commission or fee before committing to sign up to a contract, or carrying out a government function or process;
- d. A request for payment in cash and/or refusal to sign a formal commission or fee arrangement, or to provide an invoice or receipt for a payment made;
- e. A request that payment is made to a country or geographical location different from where that person resides or conducts their business;
- f. A request for an unexpected additional fee or commission to “facilitate” a service;
- g. A demand for lavish entertainment or gifts before commencing or continuing contractual negotiations or provisions of services;
- h. A request that a payment is made to “overlook” potential legal violations;
- i. A request that you provide employment or some other advantage to a friend or relative;
- j. The receipt of a non-standard or customised invoice or for an invoice that appears large given the service stated to have been provided;
- k. Refusing to put terms agreed in writing or requiring they are put in a separate document;
- l. A request or requirement to use an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- m. Being offered an unusually generous gift or offered lavish hospitality by a third party.

## 5. Gifts and Hospitality

- 5.1 The giving or receiving of gifts is acceptable, if all of the following requirements are met:



- a. It is not made with the intention of obtaining or retaining business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b. It complies with local law;
- c. It does not include cash or cash equivalent (such as gift certificates or vouchers);
- d. It is appropriate in the circumstances – for example, a small Christmas gift;
- e. Taking into account the reason for the gift, it is of an appropriate type and value and given openly in the Little Hoopers's name and at an appropriate time.

5.2 It is not acceptable for anyone to:

- a. Give, or offer, a payment, gift or hospitality with the expectation that a business advantage will be received, or to reward a business advantage already given;
- b. Accept payment that they know or suspect is offered with the expectation that it will obtain a business advantage for the person giving the gift;
- c. Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- d. Engage in any activity that might lead to a breach of this policy.

### **General Gifts and Hospitality Thresholds**

5.3 Save for attendance at basketball games that relate to the Little Hoopers's corporate hospitality allocation you must declare any hospitality or non-cash gifts accepted or offered exceeding £100 (per person) to your Executive Leadership Team ("ELT") member. These will be recorded on a monthly basis in the Gifts and Hospitality Register which will be maintained by the Finance Department and reviewed by the Board annually.



- 5.4 All non-cash gifts and hospitality given or received exceeding £250 (per person) must be approved in advance by a member of the ELT and logged in the Gifts and Hospitality Register. Approval will only be given if it can be shown that the gift or hospitality is reasonable, proportionate and is being given or received for legitimate reasons.
- 5.5 ELT members must obtain approval for all non-cash gifts and hospitality given or received exceeding £250 (per person) from the Chief Executive. Board Members must obtain approval for all non-cash gifts and hospitality given or received exceeding £250 (per person) from another member of the Board.
- 5.6 Where hospitality or a proposed gift, whether being given or received, is rejected by the ELT (or, where appropriate, the Chief Executive or a Board member) it still needs to be logged in the Gifts and Hospitality Register for auditing and record keeping purposes.
- 5.7 A member of the legal department will review the Gifts and Hospitality Register every twelve months. If specific concerns arise, they will be addressed with the relevant member(s) of staff.

### **Cash Gifts**

- 5.8 The giving of any cash or cash equivalent, other than reasonable customary tips and gratuities, is not permitted, and all cash gifts must be declared to your ELT member for retention by the Little Hoopers.

### **Hospitality Thresholds at Basketball Games**

- 5.9 Due to the nature of the Little Hoopers's business, it is important to be able to showcase the game day experience. The provision of hospitality at basketball games should be recorded via a separate process, maintained by the Executive Assistant to the Board. Any associated hospitality (i.e. travel costs, accommodation, additional meals etc.) should be recorded in the normal way, using the process outlined above.

### **Public Officials**



- 5.10 Public officials broadly include: officers and employees of government entities such as ministries, commissions, and agencies; judges; military personnel; officers of political parties; and personnel of government-controlled businesses.
- 5.11 Save for attendance at basketball games (see above) any non-cash gift or hospitality of any value offered to or received from a public official must be declared to a member of the ELT and recorded in the Gifts and Hospitality Register. It may only be retained/given following approval from an ELT member.
- 5.12 Any hospitality in excess of a reasonable lunch or evening meal with a public official is unlikely to be approved.

## 6. Facilitation Payments

- 6.1 Subject to clause 6.2 and 6.3, the Little Hoopers does not make facilitation payments. Facilitation payments are "grease" payments to public officials to "oil the wheels" - they are typically paid to get an official to do something which they were going to do (such as issue a permit or visa) as part of their function but sooner than they otherwise might have done. These payments are illegal under English law wherever they are made and however small.
- 6.2 Facilitation payments are only permitted in situations of physical duress (e.g. where you reasonably consider that refusal could place someone in personal jeopardy of injury, illness, or unlawful detention). Financial or commercial risk does not constitute duress.
- 6.3 If you are asked to make a payment on the Little Hoopers's behalf, you should always be mindful of what the payment is for, whether it is truly necessary and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment and if the payee is unwilling to provide one, you should question the legitimacy of the transaction.
- 6.4 If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Director of Legal Services. Equally, if you find yourself in a position where a facilitation payment has been made, it must be reported to the Director of Legal Services.



## 7. Charitable Donations

- 7.1 The Little Hoopers only makes charitable donations that are legal and ethical and in accordance with the Little Hoopers's Good Causes Policy. Donations offered or made over £500 are in the first instance, subject to the approval of the relevant ELT member, who if so approves should obtain the prior approval of the Chief Executive.

## 8. Engaging Suppliers and Third Parties

- 8.1 The Little Hoopers can be held legally responsible for the acts of people who act on our behalf, therefore in order to prevent any misconduct we take the following steps:
- a. Conducting due diligence on agents, distributors, suppliers and joint venture partners (together referred to as "third parties") to assess their reputation and the potential risks of misconduct;
  - b. Ensuring that commercial relationships with third parties are based on written agreements including reasonable provisions requiring compliance with applicable laws and providing reasonable remedies for violations;
  - c. Ensuring that Little Hoopers personnel monitor and review the performance of any third parties including compliance-related performance; and
  - d. Responding promptly and effectively to any reports or allegations or unlawful or unethical conduct by any third parties acting on our behalf.
- 8.2 The bribery and corruption risks associated with third parties may be higher in the following circumstances:
- a. They are based in or are providing services in a high-risk jurisdiction (see list at Appendix 1) or goods are passing through borders between high-risk jurisdictions;
  - b. The services involve people or companies interacting with public officials or government agencies;



- c. The services involve the payment of taxes, fees or other payments on the Little Hoopers behalf in relation to the import or export of goods;
- d. There are any other specific reasons to suspect that the risk of corruption is higher than normal.

8.3 The Little Hoopers's Legal Department, should be contacted if any of the situations listed above arise. They will provide advice on any further due diligence required and any anti-bribery clauses to be included in the contract.

## 9. Record Keeping

9.1 Accurate record keeping is essential to ensuring that the Little Hoopers's business is conducted lawfully, ethically, and in accordance with the direction of the Board of Directors for the benefit of its shareholders, licensees and supporters. All financial, managerial, commercial, human resources, and other records should be prepared and maintained in accordance with applicable record keeping and accounting policies. It is a violation of this policy to make any false or misleading statement or omission in connection with the preparation of company records. Accurate record keeping is explicitly required by the FCPA (and is implicit within the wording of the Bribery Act and the associated guidance published by the UK Ministry of Justice) and knowingly making false or materially misleading statements or records may result in serious penalties for responsible individuals under the FCPA, even if no bribery or corruption is involved.

## 10. Training

10.1 The Little Hoopers provide online anti-bribery training. This training is mandatory for all employees and you will be required to complete an annual refresher module.

## 11. Your Responsibilities

11.1 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Little Hoopers.





- 11.2 You must notify the Director of Legal Services as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the legal department.
- 11.3 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

## 12. The Little Hoopers Responsibilities

- 12.1 The Little Hoopers aims to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken.
- 12.2 Once made, your disclosure will, where practicable, be treated in confidence and arrangements will be made to ensure you are properly supported throughout the process. In order not to jeopardise any subsequent investigation, you too will be expected to keep the fact that you have made a disclosure, the nature of the disclosure, and the identity of those involved, confidential.
- 12.3 When a notification is received by the Director of Legal Services, a member of the legal department will arrange a meeting with you to discuss your concern, and will endeavour to do so within seven days of your disclosure. The member of the legal department will prepare a written summary of your concern and provide you with a copy after the meeting. You may be required to attend additional meetings in order to provide further information.
- 12.4 If, in the view of the Director of Legal Services, a full investigation is necessary, this will be undertaken by the legal department, in conjunction with external legal counsel where required. If necessary, the matter may be referred to the policy, a regulator or other appropriate authority.
- 12.5 The Board has overall responsibility for ensuring compliance with this policy. The Director of Legal Services has primary and day-to-day responsibility for implementation and for monitoring its use and effectiveness.
- 12.6 This policy was reviewed on February 2024.



## 13. Contacts

Director of Legal Services Sten Mayunga  
078 6163 8448  
hello@littlehoopers.org.uk

### Certification of compliance

I hereby confirm that I have read, understood and will comply with this policy.

Name: -----

Job title: -----

Signature: -----

Date: -----



# Appendix 1

## High Risk Countries

Afghanistan	Guyana	Papua New Guinea
Albania	Haiti	Paraguay
Algeria	Honduras	Peru
Angola	India	Philippines
Argentina	Indonesia	Republic of Congo
Armenia	Iran	Russia
Azerbaijan	Iraq	Sierra Leone
Bangladesh	Jamaica	Somalia
Belarus	Kazakhstan	South Sudan
Benin	Kenya	Sri Lanka
Bolivia	Korea (North)	Sudan
Bosnia and Herzegovina	Kosovo	Syria
Brazil	Kyrgyzstan	Tajikistan
Burundi	Laos	Tanzania
Cambodia	Lebanon	Thailand
Cameroon	Lesotho	The FYR of Macedonia
Central African Republic	Liberia	Timor-Leste
Chad	Libya	Togo
China	Madagascar	Trinidad and Tobago
Colombia	Malawi	Turkmenistan
Comoros	Maldives	Uganda
Cote d'Ivoire	Mali	Ukraine
DR of Congo	Mauritania	Uzbekistan
Djibouti	Mexico	Venezuela
Dominican Republic	Moldova	Vietnam
Ecuador	Mongolia	Yemen
Egypt	Morocco	Zambia
El Salvador	Mozambique	Zimbabwe
Eritrea	Myanmar	
Ethiopia	Nepal	
Gabon	Nicaragua	
Gambia	Niger	
Guatemala	Nigeria	
Guinea	Pakistan	
Guinea-Bissau	Panama	