

## Policy statement

It is Travelife's policy to conduct all of our 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 integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws of the UK, including the [UK Bribery Act 2010](#), in respect of our conduct both at home and abroad.

## Who does this policy apply to?

This policy applies to all individuals working at all levels for Travelife Ltd, including employees (whether permanent, fixed-term or temporary), auditors, consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors or any other person associated with us, wherever located (collectively referred to as workers in this policy). It also applies to Travelife accommodation providers and our suppliers.

## What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. For the purpose of the UK Bribery Act 2010, offences can fall under four categories; offering a bribe, receiving a bribe, bribing a foreign official and failure to prevent bribery by a corporate organisation. Each of these categories are described in more detail below.

**Offering a Bribe:** The offering, promising or giving of a reward to induce a person to perform a relevant function or activity improperly.

**Receiving a Bribe:** The accepting of, agreeing to accept or requesting of a reward in return for performing a relevant function or activity improperly.

**Bribing a Foreign Official:** This is a specific offence involving trying to influence a foreign public official, with the intention of obtaining or retaining business, in a situation where the public official was not permitted or required by law to be influenced.

**Failure to Prevent Bribery by a Corporate Organisation:** This occurs when an organisation fails to stop people who are operating on its behalf from being involved in bribery. This could occur as a result of the activities of a range of people working on behalf of the organisation if those individuals were involved in accepting or receiving a bribe which resulted in the organisations gaining or retaining business.

## Your responsibilities

1. You must ensure that you read, understand and comply with this policy.
2. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
3. You must notify Travelife Ltd as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Please email [info@travelife.org](mailto:info@travelife.org) if you have any questions about Travelife's anti-bribery and corruption policies.