



## UKTV ANTI-CORRUPTION CODE

### Introduction

UKTV is committed to the highest standards of ethics, honesty, openness and accountability, they are crucial to our brands. As an organisation, UKTV takes a zero-tolerance approach to any form of corruption and we support our staff in resisting and reporting any form of fraud or corruption from either our own staff or those acting on our behalf.

UKTV fully endorses all applicable anti-bribery legislation, including the UK Bribery Act 2010. We have developed proportionate procedures across all our areas of operations to ensure that bribery and corruption risks are minimised and eliminated where possible.

This is our Anti-Fraud and Corruption commitment, which we expect all our staff and those acting on our behalf to understand and comply with:

### Always

#### 1. Assess

Make yourself aware of applicable anti-bribery laws - such as the UK Bribery Act 2010 and UKTV's Staff Anti-Corruption policy before you enter into a new relationship.

- Assess any new venture or new partnership in terms of the risk it may pose in exposing UKTV to potential fraud or corruption.  
The assessment will include factors such as the reputation of the territory the business is to be undertaken in and the activity conducted. Full details on assessment procedures for UKTV staff are found in the UKTV Staff Anti-Corruption document.
- Assess any potential conflict of interest  
Ensure any hospitality you offer, or hospitality offered to you, is moderate, reasonable and appropriate and serves a legitimate business purpose and could not be seen as placing you in a conflict of interest (actual or perceived) if business was subsequently placed with yourself or a third party.
- Full details of specific areas of risk concerning hospitality are contained in UKTV's Staff Anti-Corruption Policy.  
If you are offering or accepting hospitality you must refer to the hospitality guidelines and approval process outlined within the Expenses Policy

Information on UKTV's policy and declaration process for conflicts of interest can be sought from HR.

#### 2. Inform

Ensure all the third parties that you deal with are aware of and acknowledge UKTV's zero tolerance to fraud and corruption.

#### 3. Investigate

Carry out appropriate due diligence on third parties before you enter into a higher risk deal or relationship.



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Due diligence on third parties should be undertaken with the approved due diligence questionnaire. Details of these questionnaires are held by the Business affairs and Compliance teams. For larger deals, joint ventures and key staff, more detailed external due diligence may be appropriate and should be budgeted for.

Due Diligence must include the following factors

- Be alert to close relationships between parties in the supply chain (e.g. agent / distributor) or with government officials
- Seek a breakdown of all fees/costs upfront and question anything which appears unusual.

### **4) Refer up.**

Each team should have agreed referral policy to your head of department who should refer to the Head of Regulatory Affairs, Head of Business Affairs and relevant ELT member )

If you do not feel you can refer up openly you should follow UKTV's Whistleblowing policy, details of which can be found at the end of this document.

## Never

### **1) Never accept or offer a bribe.**

UKTV operates a zero tolerance towards bribery anywhere in the world, regardless of what may be an accepted local practice.

You should never make a payment to a government official unless it is in accordance with the law. You should also never make a facilitation payment to a foreign public official (e.g. to expedite the provision of services). Please seek advice from UKTV's compliance team and/or anti-corruption officer on how to deal with such situations before you go into the field. Always seek independent verification (in writing) that the payment is legitimate

### **2. Never accept or offer any personal favours.**

'Soft money' activities (i.e. perks such as free trips, school placements or internships) may be seen as an inducement to enter or renew a contract

### **3. Damage our reputation.**

Never do deals with any third party who could bring UKTV, the BBC and BBC Worldwide's into disrepute. Our reputations could be damaged if we are associated with unsuitable business partners.

### **4. Remember, never turn a blind eye to fraud or corruption.**

If you have any suspicions or concerns then you should raise them immediately; as long as you are acting in good faith, your position will not be damaged no matter the outcome.

## **Raising your concerns and reporting fraud**

If you would like to raise a concern or report suspected bribery, fraud, corruption or anti-competitive behaviour, contact your line manager. You can also report any concerns to the UKTV's human resources team or the Company Secretary under the confidential whistleblowing process outlined within the Whistleblowing Policy.