

BRITISH SOCIETY OF TOXICOLOGICAL PATHOLOGY

BSTP Secretariat
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BSTP ANTI-BRIBERY & CORRUPTION POLICY 2022 - 2023

The BSTP strives to follow the highest ethical standards in all our interactions around the world. All members can be proud of our reputation as an ethical and responsible society. While we abide by business customs and market practices in the countries in which we do business, we do not allow or participate in any corrupt business practices. In order to comply with legal obligations arising in any of the jurisdictions in which we operate, we have implemented this Policy establishing our expected standards of legal and ethical business dealings worldwide. In order to ensure worldwide applicability, this Policy may exceed our actual legal obligations in any specific territory.

This Policy applies to all members, officers, and representatives of the Society, whether full-time, part-time, temporary, or permanent, wherever located - known for purposes of this Policy as "Representative(s)". Every Representative of BSTP, wherever located, is responsible for complying with this Policy and must report any suspected violations immediately to the BSTP Honorary Treasurer. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

RESPONSIBILITIES

As Society Trustees the BSTP Council have overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all Representatives of the BSTP Council, including the Education Subcommittee, comply with it. Nothing in this Policy is intended to be inconsistent with other BSTP policies or violate the laws or regulations in the UK. To the extent a conflict exists, Representatives should adhere to the local laws/regulations, and promptly notify the BSTP Council. This Policy may be amended, revised, or otherwise modified at any time. The Society reserves the right to amend or terminate this Policy at any time as the Society deems necessary.

BASIC PRINCIPLES

The prevention and detection of bribery and other forms of corruption are the responsibility of all members. All Representatives are required to avoid any activity that might lead to, or suggest, a breach of this Policy. As a general rule, our Representatives are prohibited from directly or indirectly offering a bribe to any third party, receiving a bribe from any third party, or attempting to bribe a government official.

By a "bribe," we mean anything of value offered, promised, paid, provided, or authorized in order to gain any improper commercial or personal advantage. For example: Accept or require a gift, payment, or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return. Additionally, this Policy prohibits any facilitation of tax evasion to government agencies.

By "third party," we mean any Sponsor engaged by the Society who is expected to interact with others (including government officials) on our behalf. Examples of third parties include: speakers, trade stand staff, professional advisors (e.g., tax, legal, accounting).

THIRD PARTIES

BSTP may be liable for an illegal act performed by a third party (including agents, consultants, and business partners) in connection with our business, so the selection of our third parties must be made only after careful deliberation and the consideration of all information available regarding their references and past performance.

Registered Charity No: 1043793

President: Elizabeth McInnes, Senior Vice-President: Begonya Garcia, Junior Vice-President: Catherine Ross,
Hon. Secretary: Bruce Wilson, Hon. Treasurer: Alys Bradley, Councillors: Zuhail Dincer, Rebecca Terry, Jayne Wright
Co-Chair Education Subcommittee: Aleksandra Zalewska and Giovanni Pellegrini

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This information includes, among other things, any contingent or retainer fee, their qualifications, and their integrity. Those Representatives dealing with third parties who will be representing the Society should familiarise themselves with potential red flags. Such "red flags" include requests for unusual payments or financial arrangements, such as payments to a numbered bank account, payments to accounts in countries other than where the agent is located such as payments to low tax jurisdictions; cash payments; inflated invoices.

POLITICAL CONTRIBUTIONS

The BSTP is a charity set up for the purpose of providing education to our members and members of the public interested in our courses and, as such, is not a political entity. The BSTP will neither fund nor in any way give support to any political party or official even if permitted by law.

RECORDS AND ACCOUNTS

The Society books, records and accounts are kept in reasonable detail to accurately reflect all transactions and dispositions of our assets. These accounting standards are applicable to all our business and require that representatives report all cash payments made to third parties on behalf of the BSTP in reasonable detail, including the amount of the payment, the recipient, and the purpose for the expenditure.

COUNTRIES IN WHICH WE SHOULD NOT CONDUCT BSTP BUSINESS

The UK Foreign Office administers a list of countries to which it is deemed unsafe for British nationals to travel. This list should be consulted before setting up training courses in other countries: <https://www.gov.uk/foreign-travel-advice>. In addition, countries known to be currently having disturbances caused by terrorists or terrorist organisations such as Boko Haram, ISIS, Al Qaeda, IRA etc. should not be considered as suitable to host BSTP events.

CONSEQUENCES OF NOT FOLLOWING THIS POLICY

This Policy requires you to comply with the UK anti-bribery laws: The U.K. Bribery Act 2010 (the "Bribery Act") and the UK Criminal Finances Act 2017 ("UK CCO"). Violations can seriously damage our reputation.

Representatives who fail to comply with this Policy will face disciplinary action, in accordance with the Society's constitution (Sections 4.3, 4.6, 12.0 – 12.2 and 13.4).

Neither the Society nor any of its Representatives or business partners are allowed to make, promise or authorise any gift, payment or offer anything of value on behalf of the Society, to a government official or to any third party who, in turn, is likely to make a gift, payment or offer anything of value to a government official. Payments by or on behalf of the BSTP should always be strictly for services rendered and the amount paid should be reasonable and customary for the services provided.

By "government official" we mean: public international groups (e.g. World Health Organization), HMRC, issuers of government permits, approvals or licenses.

Payments and reimbursements to government officials directly related to the execution or performance of a contract between BSTP and a specific person may be permissible in certain circumstances, such as reimbursement of expenses for travel to speak at a BSTP event. For this exception to apply, however, the payments or reimbursements must be reasonable and bona fide (i.e., there can be no expectation that, in return for the reimbursement, the government official will gain any personal advantage over any other person in the meeting faculty).

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Proving a lack of a corrupt intent is difficult, therefore prior written approval must be obtained from the BSTP Honorary Treasurer before making any type of payment or reimbursement (or an offer of any such payment or reimbursement) to a government official.

No payment or reimbursement will be authorised if: it is to be made in cash; it is intended as a stipend; it is for souvenirs, it is for spouses, family or other guests; any other item as prohibited in the BSTP Expense Policy.

A gift is anything of value, including gift certificates, that any representative of the BSTP gives or receives during the conduct of BSTP business. Gifts to individuals are only appropriate if they are unsolicited, business-related, not cash or usable as cash (e.g., gift cards and gift certificates), and are officially documented and declared for tax purposes - such as recognition of a charitable service to the BSTP e.g. the glass or ceramics awarded for the Mentor (Sue Ames) award, and the pens awarded for the President's award. These gifts are purchased by the BSTP Honorary Treasurer or their representative (the Secretariat) on behalf of the BSTP and the purchase value documented in the annual business accounts and openly declared to members at the AGM.

If any government official offers any Representative a gift in exchange for business or any type of service by the BSTP, Representatives must decline the offer and contact the BSTP Honorary Treasurer or President of the BSTP immediately.

Providing excessive or lavish hospitality to the BSTP event faculty group is strictly prohibited by this Policy and the BSTP procedures for expenses has clear guidance as to what is reimbursed. It will automatically be assumed that any hospitality such as a "thank you" meal for lecturers, at the beginning or end of an event, valued above £150 per person, is excessive. The BSTP Representatives should offer or accept only hospitality that is appropriate. Styles of entertainment or hospitality that are likely to compromise the BSTP's reputation as a non-discriminatory Society are always inappropriate. For instance, adult entertainment venues are never appropriate. To ensure that a business courtesy is appropriate, prior approval should be obtained from the BSTP Honorary Treasurer or BSTP President before accepting or offering hospitality to event faculty members.

SOCIETY ACTIONS ON VIOLATION OF THIS POLICY

The BSTP Council will take appropriate steps to monitor compliance with this Policy and will investigate abuses. Failure to abide by this Policy is grounds for discipline, up to and including termination of any contractual relationship, if applicable. Suspected criminal activity will be referred to the appropriate law enforcement authorities.

POLICY REVIEW

The BSTP Council will monitor the effectiveness and review the implementation of this policy at least every two years, considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as practicable. All members of the Society are invited and encouraged to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the BSTP Secretariat for consultation with BSTP Council at the next policy review meeting.

This policy will be reviewed by the Council of the BSTP every two years, with the next review due by the end of October 2023.

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