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ANTI-BRIBERY POLICY

BARC is committed to the highest standards of ethical conduct and integrity within its business. This policy outlines BARC's position on preventing and prohibiting bribery, in accordance with the Bribery Act 2010. BARC will not tolerate any form of bribery by, or of, its employees, agents, contractors or consultants or any person or body acting on its behalf. Senior management is committed to implementing effective measures to prevent, monitor and eliminate bribery.

This policy applies to all employees and Associated Persons of the Company. Every employee and Associated Person acting for, or on behalf of the Company is responsible for maintaining the highest standards of business conduct. Any breach of this policy is likely to constitute a serious disciplinary, contractual and criminal matter for the individual concerned and may cause serious damage to the reputation of the Company.

BARC prohibits employees or Associated Persons from offering, promising, giving, soliciting or accepting any bribe. The bribe might be cash, a gift or other inducement to, or from, any person or company whether public or government official, private person or company, regardless of whether the employee or Associated Person is situated in the UK or overseas. The bribe might be made to ensure that a person or company improperly performs duties or functions, to gain commercial, contractual or regulatory advantage for the Company in either obtaining or maintaining Company business, or to gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual. The Company is committed to ensuring all of its business transactions are carried out fairly and in compliance with appropriate legislation.

The prohibitions under the Act also apply to indirect contributions, payments or gifts made in any manner as an inducement or reward for improper performance, for example through consultants, contractors or sub-contractors, agents, sponsors, advisors, customers, suppliers or other third parties. This can include corporate hospitality and entertainment.

Corporate Entertainment, Gifts and Hospitality

BARC permits corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken:

- for the purpose of establishing or maintaining good business relationships;
- to improve the image and reputation of the Company; or
- to present the Company effectively.

Provided that it is:

- arranged in good faith, and
- not offered, promised or accepted to secure an advantage for the Company or any of its employees or Associated Persons or to influence the impartiality of the recipient.

BARC will authorise only reasonable, appropriate and proportionate entertainment and promotional expenditure.

Any gifts, rewards or entertainment received or offered from clients, public officials, suppliers or other business contacts should be reported to the Department Manager. In certain circumstances, it may not be appropriate to retain such gifts and employees may be asked to return the gifts to the sender in particular where there is a conflict of interest or any suggestion that the gift has not been given in good faith or is intended to affect the Company's decision-making process.

If an employee wishes to provide gifts to suppliers, clients or other business contacts, written approval from the Group Chief Executive is first required, together with details of the intended recipients, reasons for the gift and business objective. These will be authorised only in very limited circumstances with a financial cap of £50 per recipient.

Reporting Suspected Bribery

BARC depends on its employees and Associated Persons to ensure that the highest standards of ethical conduct are maintained in all its business dealings. Employees and Associated Persons are requested to assist us to remain vigilant in preventing, detecting and reporting bribery.

Employees and Associated Persons are encouraged to report any concerns that they may have to their Line Manager as soon as possible. Issues that should be reported include:

- any suspected or actual attempts at bribery;
- concerns that other employees or Associated Persons may be being bribed; or
- concerns that other employees or Associated Persons may be bribing third parties.

Any such reports will be thoroughly, properly and promptly investigated in the strictest confidence. Employees and Associated Persons will be required to assist in any investigation into possible or suspected bribery.

Any person who reports instances of bribery in good faith will be supported by BARC. We will ensure that the individual is not subjected to detrimental treatment as a consequence of the report. Any instances of detrimental treatment by a fellow employee because an employee has made a report will be treated as a disciplinary offence. An instruction to cover up wrongdoing is itself a disciplinary offence. Employees are encouraged not to remain silent on these matters and to report them.

BARC may also report any matter to the relevant authorities, including the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the Police. BARC will fully assist relevant authorities with their investigations.

Bribery within the context of motorsport competition

The Motorsport UK Yearbook contains all the regulations that governing participation in motorsport competitions. Bribery is dealt with under Section C: 'Judicial', clause 1.1.1 as follows:

1.1.1. Bribery or attempt, directly or indirectly, to bribe any person having official duties in relation to an event or employed in any manner in connection with an event or acceptance of or offer to accept a bribe by an official or employee.

Any suspected infringement of this regulation concerning a BARC event or championship, should be raised in the first instance with the BARC Chief Executive.