



Registered Office:
Oshwal Centre
Oshwal House
Coopers Lane Road
Northaw
Herts
EN6 4DG

Hon. President: Runit Devchand Shah
Hon. Treasurer: Meena Naren Shah
Hon. Secretary: Avni Jayantilal Shah
Hon. VP: Nirmal Chandrakant Shah

Telephone: 01707 643838
Email(s): admin@oshwal.org
president@oshwal.org
secretary@oshwal.org
Website: www.oshwal.org

Anti-Bribery and Anti-Corruption Policy

Version: 2.0

Author: Nirmal C Shah

Approval: Executive Committee

Effective Date: 10 July 2025

Next Review: Every 2 Years

1. Purpose

This Policy sets out the standards, controls, and procedures adopted by Oshwal Association of the UK ("OAUk") to:

- Prevent bribery and corruption in all activities
- Ensure compliance with the UK Bribery Act 2010
- Protect OAUk's reputation, assets, and charitable purpose
- Provide clear guidance to Trustees, volunteers, and representatives

2. Scope

This Policy applies to:

- All Trustees (Executive Committee and Board)
- Committee members and volunteers
- Employees (if applicable)
- Third parties acting on behalf of OAUk (agents, contractors, suppliers)

3. Policy Statement

OAUk operates a **zero-tolerance approach** to bribery and corruption.

No individual acting on behalf of OAUk may:

- Offer, promise, give, request, or accept a bribe
- Engage in facilitation payments
- Use charitable funds or influence improperly

Any breach will result in disciplinary action and may lead to removal from office and legal reporting.





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4. Definitions

Bribery

Offering or receiving anything of value to improperly influence a decision.

Corruption

Abuse of entrusted power for private gain.

Facilitation Payments

Unofficial payments made to secure routine services (strictly prohibited).

Improper Advantage

Any benefit obtained unlawfully or unethically.

5. Governance Alignment with OAUK Constitution & Regulations

This Policy aligns with:

- Trustee fiduciary duties under the OAUK Constitution
- Financial control and stewardship provisions
- Conflict of interest requirements
- Delegated authority structures under OAUK Regulations

Key Principle

All decisions must be made:

- In the best interests of OAUK
- Free from personal gain or influence
- With transparency and proper authorisation

6. Roles and Responsibilities

Executive Committee (Trustees)

- Ultimate responsibility for compliance
- Approves and reviews this Policy annually





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- Ensures adequate internal controls are in place
- Managed by the Governance and Legal Lead as the **Designated Trustee for Compliance**

Designated Trustee (Compliance Lead)

- Oversees implementation of this Policy
- Maintains registers (gifts, hospitality, breaches)
- Investigates reported concerns
- Reports to the Executive Committee

All Trustees, Volunteers, and Representatives

- Must comply with this Policy
- Must declare conflicts of interest
- Must report suspected breaches immediately

7. Prohibited Conduct

The following are strictly prohibited:

- Offering or accepting cash or cash equivalents
- Undisclosed gifts or hospitality influencing decisions
- Kickbacks or hidden commissions
- Manipulation of procurement or supplier selection
- Misuse of restricted or charitable funds

8. Gifts and Hospitality

Permitted (with conditions)

- Must be reasonable, proportionate, and infrequent
- Must not influence decision-making
- Must be declared and recorded

Prohibited

- Cash or cash equivalents





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- High-value or lavish gifts
- Gifts during procurement or decision processes

Approval Thresholds

Value	Requirement
Under £50	Declaration required
£50–£250	Pre-approval by Designated Trustee
Over £250	Executive Committee approval

9. Donations and Sponsorship

- Must align with OAUk charitable objectives
- Must not be accepted in exchange for influence
- Must undergo due diligence, where material

10. Procurement and Third Parties

All third-party engagements must:

- Follow OAUk procurement procedures
- Be transparent and competitive where appropriate
- Include anti-bribery clauses in agreements

Due diligence must be conducted for:

- High-value contracts
- Overseas transactions
- New suppliers

11. Conflict of Interest

All individuals must:

- Declare any personal or financial interest
- Recuse themselves from related decisions





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- Ensure decisions remain independent

Failure to declare is considered a serious breach.

12. Reporting Concerns (Whistleblowing)

Concerns must be reported to:

- Designated Trustee, or
- Chair of Trustees (if conflict exists)

Reports may include:

- Suspicion of bribery
- Financial irregularities
- Undue influence

All reports will be:

- Treated confidentially
- Investigated promptly
- Protected from retaliation

13. Record Keeping

OAUK will maintain:

- Gifts and Hospitality Register
- Conflict of Interest Register
- Breach and Investigation Log
- Procurement records

All records must be:

- Accurate
- Complete
- Available for audit





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14. Monitoring and Review

- Annual policy review by Trustees
- Periodic internal audits
- Lessons learned incorporated into updates

15. Training and Awareness

- Mandatory awareness for Trustees and key volunteers
- Induction briefing for new Trustees
- Periodic refreshers

16. Breach of Policy

Breaches may result in:

- Removal from Trustee or volunteer position
- Disciplinary action
- Reporting to regulators (e.g. Charity Commission)
- Legal action

17. Approval and Adoption

This Policy is approved by the Executive Committee of Oshwal Association of the UK and is binding on all individuals acting on its behalf.





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Appendices

Appendix A – Gifts & Hospitality Register Template

| Date | Name | Description | Value | Approved By | Notes |

This should be managed by the Compliance Lead and the Admin Office at OAUk.

Appendix B – Due Diligence Checklist Templates

1. Supplier Background Check Template

Purpose: To assess legitimacy, reputation, and suitability of the supplier.

Supplier Details

- Supplier Name: _____
- Registered Company Number (if applicable): _____
- Registered Address: _____

- Country of Operation: _____
- Website: _____
- Contact Person: _____

Completed By

- Name: _____
- Role: _____
- Signature: _____
- Date: ____/____/____

2. Conflict of Interest Screening Template

Purpose: To identify and manage any personal or financial conflicts.

Individual Completing Declaration

- Name: _____





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- Role in OAUK: _____
- Project / Transaction: _____

Conflict Disclosure

Question	Yes/No	Details
Do you have any financial interest in the supplier?		
Do you have any personal relationship with supplier personnel?		
Have you received gifts or hospitality from this supplier?		
Are you involved in decision-making related to this supplier?		

Declaration

I confirm that:

- The above information is complete and accurate
- Any conflicts identified have been disclosed

Signature:

Date: ____/____/____





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Review Outcome

Outcome	Details
No conflict identified	
Conflict identified – mitigated	
Conflict identified – recusal required	

Approved By (Designated Trustee)

- Name: _____
- Signature: _____
- Date: ___/___/___

3. Approval Documentation Template

Purpose: To evidence formal approval in line with OAUk governance.

Transaction Details

- Project / Activity: _____
- Supplier Name: _____
- Description of Goods/Services: _____
- Total Value (£): _____
- Budget Line: _____





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Due Diligence Summary

Area	Status	Notes
Supplier Background Check	Completed / Pending	
Conflict of Interest Screening	Completed / Pending	

Approval Levels

Approval Required	Name	Signature	Date
Portfolio Trustee			
Executive Committee (if required)			

Final Decision

- Approved
- Approved with Conditions
- Rejected

