

Esports Wales

Anti Bribery & Corruption Policy

Status: Board approved policy

Applies to: Directors, Staff, Volunteers, Members, Players, Officials, Clubs, Partners, Contractors

Owner: Board of Directors

Integrity & Ethics Lead: Board appointed Director / Senior Officer

Review cycle: Annual

Next review due: 12 months from adoption

1. Purpose

1.1 This policy sets out **Esports Wales CIC's** ("the Company") **zero-tolerance approach to bribery and corruption** in all aspects of its governance, operations, and competition activity.

1.2 It exists to:

- protect the **integrity, credibility, and reputation** of Esports Wales
 - ensure compliance with the **UK Bribery Act 2010**
 - prevent improper influence over decisions, competitions, or outcomes
 - provide clear guidance on acceptable and unacceptable conduct
 - support transparency and accountability, particularly where public funding is involved
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2. Scope

2.1 This policy applies to:

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Version Number: 001



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- Board members
- staff and volunteers
- players, officials, and participants
- clubs, members, and affiliated organisations
- contractors, suppliers, and partners

2.2 It applies to all activity:

- undertaken on behalf of Esports Wales
 - connected to Esports Wales competitions, events, or governance
 - whether conducted in person, online, or digitally
 - in the UK or overseas, where linked to Esports Wales
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3. What Is Bribery & Corruption?

3.1 Bribery

Bribery is the **offering, promising, giving, requesting, or accepting** of an advantage (financial or otherwise) to induce or reward **improper performance** of a function or activity.

3.2 Corruption

Corruption is the **abuse of entrusted power for private gain**, including:

- misuse of position or authority
 - improper influence over decisions or outcomes
 - dishonest or unethical conduct for personal or organisational benefit
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4. Zero-Tolerance Position

4.1 Esports Wales operates a **zero-tolerance policy** towards bribery and corruption.

4.2 Any form of bribery or corrupt behaviour is **strictly prohibited**, regardless of:

- value
 - frequency
 - cultural practice
 - perceived benefit to the organisation
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5. Prohibited Conduct

The following behaviours are **strictly prohibited**:

- offering or accepting bribes, inducements, or kickbacks
 - soliciting advantages to influence decisions, appointments, or outcomes
 - accepting gifts, hospitality, or benefits intended to influence behaviour
 - misuse of confidential information for personal gain
 - facilitating bribery or corruption through third parties
 - failing to report suspected bribery or corruption
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6. Gifts, Hospitality & Conflicts of Interest

6.1 This policy must be read alongside:

- **0109 Conflicts of Interest Policy**
- **0110 Gifts & Hospitality Policy**

6.2 Gifts or hospitality must **never** be:

- excessive

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- secretive
 - linked to decisions, competitions, or procurement
 - offered or accepted to gain improper advantage
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7. Bribery & Corruption Risks in Esports

7.1 Esports Wales recognises that bribery and corruption risks may arise in esports, including:

- competition outcomes or selections
- access to events, teams, or pathways
- procurement and sponsorship arrangements
- digital environments and online platforms
- third-party relationships

7.2 All individuals must remain vigilant to such risks.

8. Duty to Prevent & Report

8.1 All individuals covered by this policy have a responsibility to:

- act honestly and ethically
- avoid situations that could give rise to bribery or corruption
- report concerns promptly

8.2 Failure to report suspected bribery or corruption may itself be treated as a breach of this policy.

9. Reporting Bribery & Corruption Concerns



9.1 Concerns may be reported via:

- the Integrity & Ethics Lead
- line management (where appropriate)
- complaints procedures
- **whistleblowing routes**

9.2 Reports may be made:

- confidentially
- in good faith

9.3 No individual will be disadvantaged for raising concerns honestly and responsibly.

10. Responding to Allegations

10.1 Allegations of bribery or corruption will be:

- taken seriously
- assessed promptly and impartially
- investigated in line with principles of fairness and natural justice

10.2 Esports Wales may:

- suspend individuals pending investigation
 - terminate relationships with third parties
 - refer matters to law enforcement or regulators
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11. Sanctions

11.1 Confirmed breaches of this policy may result in:

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- disciplinary action
- removal from roles or positions
- disqualification or banning from competitions
- termination of contracts or partnerships
- referral to external authorities

11.2 Sanctions will be:

- proportionate
 - consistent
 - clearly communicated
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12. Training & Awareness

12.1 Esports Wales will:

- promote awareness of bribery and corruption risks
- provide guidance to those in higher-risk roles
- ensure relevant policies are understood

12.2 Clubs and partners are expected to support this approach.

13. Confidentiality & Information Sharing

13.1 Bribery and corruption matters will be:

- handled sensitively and confidentially
- shared only on a need-to-know basis

13.2

Information may be shared where:

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- required to protect integrity
 - necessary for investigation or enforcement
 - legally required
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14. Roles & Responsibilities

14.1 Board of Directors

- holds ultimate responsibility for anti-bribery and anti-corruption
- sets the ethical tone of the organisation

14.2 Integrity & Ethics Lead

- oversees implementation of this policy
- manages reports and investigations
- reports issues and trends to the Board

14.3 All Individuals

- must comply with this policy
 - must act with integrity and honesty
 - must report concerns
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15. Linked Policies & Procedures

This policy must be read alongside:

- **0401 Integrity & Ethics Policy**
- **0402 Match-Fixing & Competition Manipulation Policy**
- **0403 Betting & Gambling Policy**
- **0109 Conflicts of Interest Policy**

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- **0110 Gifts & Hospitality Policy**
 - **0116 Whistleblowing Policy**
 - **0115 Complaints About the Board Procedure**
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16. Monitoring & Review


16.1 Esports Wales will:

- monitor bribery and corruption risks
 - review this policy annually
 - update it in response to governance, legal, or funding changes
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17. Adoption

This AntiBribery & Corruption Policy was approved by the Board of Directors of **Esports Wales CIC**.

Date approved: ___09/03/2026___

Signed (Chair):___  ___

