Anti-corruption & bribery policy

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About this policy

It is our policy to conduct all of our business honestly and ethically. Accordingly, we take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.

Any employee who breaches this policy will face disciplinary action, resulting in dismissal for gross misconduct. In addition, any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any employee's employment contract, and we may amend it at any time. We will review this policy regularly.

Who must comply with this policy?

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

What is bribery?

Definitions:

- **Bribe** means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust, or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract, or any other advantage or benefit.
- **Bribery** includes offering, promising, giving, accepting, or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure whether a particular act constitutes bribery, raise it with your manager or a Senior Management Team member.

Specifically, you must not:

- give or offer any payment, gift, hospitality, or other benefits in the expectation that a business advantage will be received in return or to reward any business received.
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else.
- give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;

You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts & hospitality

The giving or accepting of reasonable and appropriate hospitality is permitted subject to receiving prior written consent from the Executive Director, and only for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, to public officials or during contractual negotiations or a tender process).

Gifts must be of an appropriate type and value depending on the circumstances and taking into account the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.

Promotional gifts of low value, such as branded stationery, may be given to or accepted by existing customers, suppliers, and business partners.

Record-keeping

You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts, or payments to third parties per our expenses policy and record the reason for expenditure.

You must declare and keep a written record of all hospitality or gifts offered but not accepted.

All accounts, invoices, and other records relating to third parties, including suppliers and customers, should be prepared with strict accuracy and completeness. In addition, all accounts must not be kept "off-book" to facilitate or conceal improper payments.

How to Raise a Concern

If you are offered a bribe or are asked to make one, or if you suspect that any bribery, corruption, or other breaches of this policy has occurred or may occur, you must notify your manager or a member of the Senior Management Team as soon as possible.