	Doc. No.	ALL.P.00.007
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This policy is applicable for the Organization and affiliated companies and must be adhered to its full extent. This policy is supplementary to the [Code of Good Conduct & Ethics](#).

- Purpose:** The purpose of this policy is to state the Organization position and to provide information and guidance on recognising and dealing with bribery and/or corruption and/or fraud.
- Scope:** This policy covers all employees including those on temporary and fixed term contracts, external resources, agents, distributors, consultants, sub-contractors, business partners and any other person or organisation who performs services for or on behalf of the Organization in any location around the world.
- Definition:** As laid out in the Vision & Mission Statement and the Code of Good Conduct and Ethics the Company integrity is an essential key value. It is the Organization policy to maintain the highest standards of ethics in all of our business dealings worldwide. The Organization is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships. The staff are not permitted to give, offer, promise, accept, request or authorise a bribe, whether directly or indirectly. The definitions of bribery, corruption or fraud can be found in the ["Terminology list \(ALL.P.00.003\)"](#).
- Responsibilities** The Organization policy and procedures designed to prevent bribery, corruption or fraud is maintained and overall controlled by the Chief Financial Officer. Each country and business unit must strictly adhere to this policy and it is the responsibility of the local senior management that employees, supervisors and managers all are fully aware of this policy and adherence thereto.

### Introduction

Bribery, corruption and fraud harm the Organization and stakeholders, threaten honest business and damages economic development. In addition, bribery is a serious criminal offence in all the countries in which the Organization operates. All staff are responsible for meeting their personal legal obligations not to commit bribery and/or corruption and/or fraud and adhere strictly with this Policy.

An act of bribery anywhere in the world by persons associated with the Organization can expose it to the risk of prosecution for failing to prevent bribery. This can result in an unlimited fine unless the Organization can demonstrate that adequate procedures are in place to prevent it.

### Policy Statement

The Organization strictly prohibits bribery in any form – including the use of ‘facilitation payments’. The Organization does not allow charitable donations, sponsorships and direct or indirect contributions to political parties or organisations to be used as a subterfuge for bribery.


The Organization does not offer gifts or entertainment as an advantage intending to commit bribery. All gifts and entertainment must be given or received in accordance with the applicable Organization policy and procedure.

The Organization prohibits bribery, corruption, fraud committed by third parties acting on its behalf. The Organization mandates appropriate due diligence on all such third parties, and the application of suitable contractual terms and governance to reduce the risk of bribery, corruption or fraud. The Organization prohibits anyone acting on its behalf from offering anything of value to public officials or people associated with them, with the intent of obtaining or retaining a business advantage for the Organization. This policy sets out a single standard that all employees must comply with, regardless of whether local law or practices might permit something to the contrary.

Staff must retain accurate books and records of transactions or decisions relating to the Policy or any associated procedures. Staff must report any concerns they may have with respect to non-compliance with this Policy. The Organization maintains processes to enable staff to raise such concerns in confidence.

The organization has a zero tolerance approach to bribery, corruption and/or fraud and is subject to the Code of Good Conduct & Ethics and Performance Management procedures.

Staff found to have breached this Policy will face disciplinary action, which could result in dismissal for gross misconduct. Potential penalties include the termination of employment as outlined in the procedure ["Performance Management - Organization \(ALL.F.08.001\)"](#).

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### Gifts and Hospitality

Organization’s employees, agents and other representatives are prohibited from giving or receiving money or gifts which could be construed as bribes. This policy does not prohibit normal and appropriate hospitality (given or received) to or from third parties.

Generally speaking, giving or accepting gifts of low monetary value such as corporate give-aways, consumables or other items of nominal value is acceptable provided you don’t ask for the gift and as long as it does not influence, or have the appearance of influencing, your objectivity or decision-making. As a general rule, if accepting a gift could cause you (or a reasonable person in your position) to feel an obligation, the gift should be refused. Larger gifts are more likely to cause a conflict of interest. Among the factors to be considered in determining the appropriateness of a gift over this amount will be whether the gift is customary in the particular geography or industry concerned and openly given without any expectation or realization of special advantage.

Corporate hospitality, such as business lunches, dinners, drinks, hospitality at a sports or social event or other meetings in a social context are not considered to be gifts if a significant purpose of the meeting is business-related and your participation is in the ordinary course of business and is usual and customary.

### Awareness

Staff members, non-staff personnel, vendors, sub-contractors, partners and responsible parties must be aware of their responsibility to prevent bribery, corruption and fraud. In this regard, managers are to raise awareness of this Policy, and reiterate the duty of all staff members to report instances of bribery, fraud and corruption. Managers are also required to make non-staff personnel, vendors, implementing partners and responsible parties contracted/engaged by their respective offices aware of this Policy supplementary to the [Code of Good Conduct & Ethics](#).

### Management of the risk

The risk of bribery, fraud and corruption is assessed and managed in accordance with Risk Management procedure. Managers shall identify and assess the risks in their program or project areas, including the risk of bribery, fraud and corruption, and apply mitigating measures, taking due account of the level of risk involved. Because it is impossible to eliminate all risks, good risk management requires a sound balance of the following aspects: assessment, mitigation, transfer or acceptance of risks. These risks shall be communicated to relevant stakeholders, together with an assessment of the extent to which risks can be mitigated.

### Facilitation payments and kickbacks

The Organization will not make facilitation payments or “kickbacks” of any kind. Facilitation payments are small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. It is to avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Organization of its representative.


### Reporting

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Organization or under our control. All employees and other representatives are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your (senior) manager or the Chief Financial Officer confidential reporting line as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

### Record Keeping

The organization keeps financial records and has appropriate internal controls in place to evidence the business reason for making payments to third parties. Accordingly you must ensure that all expenses claims relating to hospitality or gifts incurred by you on behalf of the Organization for the benefit of a third party are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

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**Due diligence**

In dealing with third parties, the Policy requires sufficient due diligence to be undertaken to ensure that they are suitable to be associated with our Organization, and that appropriate controls are implemented, designed to prevent and detect bribery and corruption. This is to ensure the third parties the Organization engages will not bribe or perform a corrupt act on the Organization’s behalf or for which the Organization may be responsible or otherwise liable.

**Reference Policies & Procedures:**

*(click on the following links to open the documents)*

- [SCG.P.00.001 - Vision & Mission statement](#)
- [ALL.W.08.003 - Code of Good Conduct & Ethics](#)
- [ALL.P.08.002 - Travel & Expense Reimbursement](#)
- [ALL.P.00.003 - Terminology list](#)

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