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## ANTI-BRIBERY POLICY

*This also applies to WFSA (UK), Registered Charity Number 1166545*

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### 1. Purpose of policy

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery regulations, and to ensure our business is conducted in a socially responsible manner. This policy applies to all the countries and territories that we as an organisation operate in. This policy needs to be read alongside WFSA’s Finance Policy and Procedures Manual, Code of Conduct, Whistleblowing and Conflicts of Interest policies.

### 2. Policy statement

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, implementing, and enforcing effective systems to counter bribery. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. This includes the UK Bribery Act 2010.

### **3. Scope**

This policy applies to all employees, volunteers (which consist of Board, Council and Committee members along with others who give their time freely to advance the mission and vision of the WFSA) and other associated personnel, including interns, scholars and fellows, agency staff, and anyone from a Member Society, partner organisation or institution that is involved in WFSA's work or working on behalf of WFSA. This policy covers:

- Bribes;
- Gifts and hospitality;
- Facilitation payments;
- Political contributions;
- Charitable contributions.

In this policy, third party means any individual or organisation you meet during the course of your work for WFSA, and includes actual and potential beneficiaries, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians, and political parties. All arrangements with third parties should be subject to clear contractual terms, including specific provisions requiring them to comply with minimum standards and procedures in relation to bribery and corruption.

### **4. Bribes**

Employees and those listed above ('Scope') are subject to this policy and must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, those listed above must not bribe a public official anywhere in the world. As a UK-headquartered organisation, all staff must abide by UK law and the law of the country they are volunteering or working in.

### **5. Gifts and hospitality**

Corruption risks associated with the giving and receiving of gifts and hospitality can arise in anyone's job. In fact, giving and receiving gifts and hospitality is one of the easiest ways to end up involved in corruption. This policy is not intended to prohibit normal and appropriate hospitality given to or received from third parties. However, employees must ensure the highest standards of behaviour in the accepting of gifts and rewards. Any gifts or hospitality that might attract the suspicion of improper motives or inducements should be rejected and declared to the CEO or the Board. As a guide, you are not prohibited from accepting a gift from or giving a gift to a third party, if:

- a. it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b. it complies with local law;
- c. it is given in our name, not in your name;
- d. it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- e. it is appropriate in the circumstances (for example, if a small gift is given at the time of Eid or Christmas);
- f. considering the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- g. it is given openly, not secretly.

Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the express prior approval of the WFSA Board.

We appreciate that the market practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether, in all the circumstances, the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

- a. Do not offer anything that might compromise, or seem to compromise, your professional judgement;
- b. Cash gifts are never acceptable;
- c. Only offer and accept gifts and entertainment that are reasonable in value and appropriate to the occasion and your position within WFSA;
- d. Use your common sense and err on the side of caution.

You must log all gifts, hospitality and entertainment accepted or offered worth more than US\$50 in the Gifts Register maintained by the Governance Assistant. You must ensure all expenses claims relating to gifts, hospitality or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

You must get CEO / Board consent for all gifts and entertainment worth more than US\$50.

## **6. Facilitation payments and kickbacks**

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low-level officials for them to deliver the level of service one would normally be entitled to.

Our strict policy is that facilitation payments must not be paid. We recognise, however, that our employees may be faced with situations where there is a risk to the personal security of an employee or his/her family and where a facilitation payment is unavoidable, in which case the following steps must be taken:

- Keep any amount to the minimum;

- Create a record concerning the payment;
- Report it to your line manager.

## **7. Political contributions**

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

## **8. Charitable contributions**

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation on behalf of the organisation must be offered or made without the prior approval of a member of the WFSA Board or the CEO.

## **9. Record-keeping**

You must declare and keep a written record of all gifts accepted or offered, which will be subject to management review. You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our travel and expenses policy.

## **10. How to raise a concern**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager, or a member of the Board.

## **11. What to do if you are a victim of bribery or corruption**

It is important that you tell your line manager as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

## **12. Protection**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

## **13. Training and communication**

Sharing and understanding of this policy forms part of the induction process for all new employees, consultants, Board Members, and volunteers. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, and partners at the outset of our relationship with them and as appropriate thereafter.

## **14. Responsibility for the policy**

The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The CEO has primary and day-

to-day responsibility for implementing this policy and for dealing with any queries on its interpretation.

Management and volunteers at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.

All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

**15. Agreement to abide by the policy**

I have read and understood the WFSA's anti-bribery policy.

My signature below indicates that I will abide by this policy and agree to conduct myself appropriately as a representative of WFSA.

Name:	Signature:
Role:	
Date:	