



## **ETHICAL AND ANTI-BRIBERY POLICY**

It is the policy of Global Partners Governance (GPG) to conduct business in an honest and ethical manner. A zero-tolerance approach is applied to bribery and corruption at every level in the business. This policy provides guidance in accordance with the Bribery Act 2010 ('the Act') (see footnote) but if you are concerned about any business dealing, irrespective of the Act, you should report this immediately to your Manager or Director.

This policy applies to all individuals working at all levels and grades, including senior manager, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with GPG, its subsidiaries or their employees (collectively referred to as workers in this policy), whether located in the UK or overseas. In this policy, third party means any individual or organisation you come into contact with during the course of your work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies. Including their advisors, representatives and officials, politicians and political parties.

GPG will monitor the effectiveness of this policy regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. It does not form part of your contractual terms.

### **WHAT IS BRIBERY?**

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. An example might be offering potential client tickets to a major sporting event, but only if they agree to do business with GPG

Bribes may not be obvious. For instance, if a supplier gives a family member a job, but makes it clear that in return they expect you to use your influence in the business for their benefit, this would be unlawful.

The aim of this policy is not however to prohibit normal and appropriate hospitality being given to or received from third parties. Gifts or hospitality must not however be given or received with the intention of influencing a third party to provide a business or personal advantage. You should ensure:

- The gift or hospitality offered or received complies with local law;
- It is given in the name of GPG, not in your name;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- It is appropriate. For example, in the UK is it customary for small gifts to be given at Christmas;
- Considering the reason for the gift, it is appropriate in terms of type, value and timing;
- It is given openly, not secretly; and
- It is not offered to or accepted from government officials or representatives, or politicians or political parties, without the prior approval of a Director.

It is not acceptable for you (or someone on your behalf):

- To give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them or a business advantage will be provided by GPG in return;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation of a business advantage;
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- Engage in any activity that might be a breach of this policy.

## **STAFF RESPONSIBILITIES**

You must ensure that you read, understand and comply with this policy. The policy is communicated to all new workers as part of their induction process and is communicated, with relevant training, to existing workers. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for GPG.

You must notify your Manager or a Director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage, or indicates to you that a gift or payment is required to secure their business.

GPG is required to keep financial records which will evidence the business reason for making payments to third parties. You must therefore declare and keep a written record of all hospitality or gifts accepted or offered, and ensure that all expenses claims relating to hospitality, gifts or expenses incurred are submitted in accordance with the expenses policy and specifically record the reason for the expenditure.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

## **RAISING CONCERNS**

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage or if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your Manager or a Director.

If you become aware or suspects that a past or future activity or conduct is in breach of this policy, you have a duty to report this to GPG's Director.

GPG appreciates that the success of its Ethical and Anti-Bribery Policy depends on all employees and those acting on its behalf playing their part, therefore GPG supports any individual who makes such a report in good faith.

All personnel, consultants, sub-contractors or any person or company working on behalf of GPG can contact the FCDO Counter Fraud and Whistleblowing Unit at [reportingconcerns@fcdo.gov.uk](mailto:reportingconcerns@fcdo.gov.uk) to report suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance.

GPG encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. GPG is committed to ensuring no one suffers any detriment or unfavourable treatment as a result of refusing to take part in bribery or corruption, or because they report something in good faith. If you believe you have received any such treatment, you should raise the issue initially with your Manager and if it is not remedied, and you are an employee, you should raise it formally through the grievance procedure.

Should you wish to raise your concern confidentially, you can also use the form at: <https://gpgovernance.net/safeguarding-contact-form-report-a-concern/>.

This statement is in relation to Slavery & Human Rights

Global Partners Governance (GPG) is committed to doing all that we can to ensure there is no modern slavery or abuses in our supply chains or in any part of our business.

GPGs Code of Conduct and Code of Ethics & Anti-Bribery policies describe our expectations of our employees and business partners when conducting their duties.

### **Modern Slavery**

In accordance with the Modern Slavery Act 2015 Human trafficking and slavery are crimes under UK and international law. These crimes exist in countries throughout the world. This statement defines GPGs commitment to ensuring that human trafficking and slavery does not exist within its own business but also provides how GPG will make efforts to eradicate the same from other businesses with whom it shall maintain a relationship.

### **Human Rights**

GPG understands our responsibility to respect the human rights of our employees and those of the communities in which we operate.

We provide fair working conditions for our employees including terms and conditions of employment, remuneration, working hours, health and safety, holiday entitlements and benefits.

GPG will act ethically and with integrity in all our relationships and use all reasonable endeavours to take action directly and within our sphere of influence to ensure slavery and human trafficking is not taking place. This includes:

- The standards we expect from our suppliers:
- Not to use child labour
- Not to use forced or compulsory labour
- Legal wages and hours
- Safe working conditions
- Diversity of staff

## **Training**

GPG provides all new employees with awareness of modern slavery and how to act in the event of discovering human rights issues within the induction programme.

**I confirm that I have read, understood and will comply with GPG's Business Ethics and Anti Bribery Policy.**

**Signature .....**

**Name .....**

**Date .....**

The Bribery Act 2010 received Royal Assent on 8 April 2010. A full copy of the Act and its Explanatory

Notes can be accessed at: [www.opsi.gov.uk/acts/acts2010/ukpga\\_20100023\\_en\\_1](http://www.opsi.gov.uk/acts/acts2010/ukpga_20100023_en_1)