

## **§ 1 Policy Statement**

- Inter-Cultur takes a zero-tolerance approach to bribery in all forms including facilitation gifts, payments and favors.
- Bribery cannot be explained or justified by local customs.
- Action will be taken through line management, following discussion with the Executive Director, in respect of any staff member who fails to adhere to the policy.
- External legal action may result in prosecution, fines and/or prison sentences for both the staff member and Inter-Cultur.

## **§ 2 Background**

- Bribery and corruption are found in all countries. They hurt the poor disproportionately, diverting resources intended for development and humanitarian assistance and increasing the costs of basic public services. They undermine economic growth and are a barrier to poverty alleviation and good governance. Often, bribery and corruption can aggravate conflict and insecurity.
- Suggestions that an NGO is linked to bribery in any way can be damaging to its reputation and undermine the trust and support of people and communities we work with / support, partners, the wider public, and donors. Public concern about the impact of bribery and corruption is a critical issue in building broad public support for aid and development.
- Bribery is also contrary to commonly held values of integrity, transparency, and accountability and as such undermines organizational effectiveness.

## **§3 Risk Statement**

- Due to the nature of our operations, there is a medium risk that Inter-Cultur staff and partners will be subject to requests for bribes and/or the temptation to pay bribes or facilitation payments. The impact on the organization of any proven or alleged bribery is high due to the potential for reputational damage.

## **§4 Policy Details**

### **• Definition and examples**

A bribe can take many forms and be of any size. Where the offer or receipt is intended for family or friends, or when bribery takes place through our partners, contractors or agent, it is still considered to be a bribe. Inducements can take the form of gifts, loans, fees, rewards, or other advantages.

### **• Gifts and hospitality**

In some countries, gift-giving and hospitality are common. Genuine hospitality and the giving/receiving of gifts are not prohibited. However, it is important to note the Inter-Cultur guidelines on anti-bribery when giving or receiving gifts or hospitality.

- **Payments under duress – extortion, not bribery**  
In all cases, the security and safety of staff, partners and representatives must not be compromised. Although Inter-Cultur security procedures should minimize the likelihood, in some cases a payment under duress may need to be made. “Duress” includes a threat to safety and security and does not include the threat of delay or inconvenience. A payment under duress is considered to be extortion and not bribery and should be reported as a security incident under Inter-Cultur’s security procedure.
- **Operational effectiveness and the humanitarian imperative**  
Inter-Cultur does not tolerate bribery and does not accept the argument that in some circumstances there is no choice but to make facilitation payments or pay bribes either for operational efficiency or because of the humanitarian imperative.

## **§5 Policy Dissemination**

- To ensure thorough understanding and compliance, the Anti-bribery policy will be disseminated through the following channels:
  - Anti-bribery training sessions will be conducted upon employee onboarding.
  - For developing cooperation partners, this policy is integral to the ethical principles to which we abide. A reference to this policy and its explanation shall be conducted during cooperation agreement negotiations.
  - The anti-bribery policy document will be accessible on the company’s intranet for all employees and partners.
  - Annual reminders will be sent to employees and developing cooperation partners to reinforce the importance of anti-bribery compliance and highlight key aspects of the policy.

## **§ 6 Compliance with Policy**

- The Executive Director is responsible for monitoring compliance. If a lack of compliance with this policy is identified by any individual, please report it immediately to the Executive Director.
- If a lack of compliance with this policy is identified by the Executive Director, please report it immediately to the **Audit Committee of the Board of Directors**.
- If any staff members feel under duress to pay a bribe or facilitation payments or are unsure whether a payment constitutes a bribe or facilitation payment, they should contact the Executive Director for advice.

## **§ 7 Board of Directors (BOD)’s responsibilities**

- The Board of Directors (BOD) holds the ultimate responsibility for reviewing and approving this policy.
- It is imperative that the BOD ensures Inter-Cultur’s compliance with the policy and takes all necessary steps to protect the organization’s assets, reputation, and stakeholders.

## **Anti-bribery Policy**

Version 1.0 (2024)



- BOD members, in conjunction with the Executive Director, will be held personally liable for any negligence or failure to uphold the standards outlined in this policy, resulting in financial loss, reputational damage, or harm to the organization and its stakeholders.
- It is incumbent upon the BOD to exercise due diligence in overseeing the implementation and enforcement of the policy to safeguard the organization's interests.