



GIACC

Global Infrastructure Anti-Corruption Centre



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Anti-Corruption Policy

This section provides guidance in relation to the writing and adoption by an organisation of an  corruption policy (Measure 1 of the [Anti-Corruption Programme for Organisations](https://giaccentre.org/programme-organisations/) (<https://giaccentre.org/programme-organisations/>)).

There should be two parts to an organisation's anti-corruption policy:

- A commitment by the organisation to prohibit corruption.
- A commitment by the organisation that it will implement measures to:
 - prevent corruption by, on behalf of, or against the organisation; and
 - detect, report and deal with any corruption which does occur.

Both parts are necessary. As with any management commitment, it would be insufficiently effective if management merely made a statement of intent (i.e. "we prohibit corruption") but did nothing to follow through with it. Any statement of policy needs management measures to ensure as far as reasonable that the policy is put into effect and is complied with by personnel and business associates.

The policy may be a separate policy dealing only with corruption. Alternatively, the organisation may issue a policy statement covering several topics, including, for example, corruption, health and safety, quality, protecting the environment, non-discrimination etc.

The organisation must formally adopt the policy. This adoption of the policy should be recorded. This could be by way of a board resolution in the case of an organisation with a board, or, in the case of an organisation owned and controlled by one person, by a signed resolution by that person.

See sample [Anti-Corruption Policy](https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.ANTI-CORRUPTIONPOLICY.docx) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.ANTI-CORRUPTIONPOLICY.docx) which can be adapted and used by an organisation.

See paragraph 1 of sample [Board Resolution](https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.BOARDRESOLUTION.docx) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.BOARDRESOLUTION.docx) to adopt the Anti-Corruption Policy.

The anti-corruption measures referred to in the policy (i.e. the measures designed both to prevent corruption, and to detect, report and deal with any corruption which occurs), are contained in measures 2 to 21 of the [Anti-Corruption Programme](https://giaccentre.org/programme-organisations/) (<https://giaccentre.org/programme-organisations/>).

Implementation checklist for Measure 1

1. The board (or the organisation's equivalent top management body or person) should agree that the organisation will adopt and comply with an anti-corruption policy.
2. The board should appoint a manager to write an anti-corruption policy (see sample [Anti-Corruption Policy](https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.ANTI-CORRUPTIONPOLICY.docx) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.ANTI-CORRUPTIONPOLICY.docx)).
3. The board should pass a resolution (at a meeting or by a signed resolution) (see paragraph 1 of sample [Board Resolution](https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.BOARDRESOLUTION.docx) (https://giaccentre.org/chess_info/uploads/2019/10/GIACC.WEBSITE.BOARDRESOLUTION.docx)) which agrees and records that the organisation will adopt the anti-corruption policy. [Note: This board resolution can deal at the same time with measures 1, 2, 3 and 5 of the [Anti-Corruption Programme](https://giaccentre.org/programme-organisations/) (<https://giaccentre.org/programme-organisations/>), or separate resolutions can be passed].
4. The organisation should publish the policy.

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