

SAMPLE ANTI-CORRUPTION POLICY

The following sample policy can be adapted and used by an organisation. It only covers the anti-corruption aspects of the organisation's policies. The organisation could, if it wishes, adopt a broader policy to cover also other compliance issues, such as health and safety, quality, the environment, non-discrimination etc.

[NAME OF ORGANISATION]

ANTI-CORRUPTION POLICY

Laws: We will comply with all laws in all jurisdictions in which we operate.

Criminal activity: We prohibit all forms of criminal activity:

- We will not give or receive bribes or improper advantages, either directly or through any third party.
- We will not defraud or deceive anyone or act dishonestly.
- We will not participate in any cartel.
- We will not give or receive facilitation payments.
- We will not give or receive any gift, hospitality, donation or benefit that may improperly influence a decision or impair independence or judgement.
- We will not participate in any other criminal activity, such as extortion, collusion, breach of trust, abuse of power, embezzlement, trading in influence or money laundering.

Conflicts of interest: We will avoid or deal appropriately with situations in which our own interests could conflict with our obligations or duties.

Personnel and controlled organisations: We will ensure that our personnel and organisations which we control comply with this policy.

Business associates: We work only with organisations and people that conform to standards consistent with our own.

Procedures: We will implement appropriate management procedures to help prevent any breach of this policy, and to detect, report and deal with any breach which may occur.

This policy has been adopted by [Organisation] board resolution on [date].

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[Chief Executive Officer]
[Organisation]

[date]