

15. Anti-Corruption & Anti-Bribery

The purpose of this policy is to ensure that Interpeace has appropriate systems and procedures in place to prevent bribery and other forms of corruption. It is Interpeace policy to comply with all applicable anti-bribery laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), and all applicable local laws where Interpeace operates, and to accurately reflect all transactions on Interpeace's books and records.

The intention of this policy is to supplement our Code of Conduct in the Employment Policy Manual (EPM) and the other policies and procedures in this manual and to help ensure that appropriate and ethical conduct is applied across the organisation's activities throughout the world and to comply with local and international law regarding corruption and bribery.

The U.S. FCPA prohibits bribery of Government Officials; the UKBA prohibits all bribery, of both Government Officials and private individuals, and includes facilitation payments in its prohibitions. Our policy prohibits all forms of bribery to be consistent with both laws.

To make clear Interpeace's compliance with the UKBA, this policy also expressly prohibits facilitation or "grease" payments, which are typically small, infrequent payments made solely to speed up non-discretionary actions, like getting electrical power turned on or phones installed. Under the UKBA, facilitation payments are considered bribes. In addition, the UKBA and this policy both prohibit bribery of non-governmental persons.

This policy and the Code of Conduct are to be part of the induction process for all new colleagues and local partners.

15.1 Definitions

15.1.1 "Corruption"

"Corruption" includes bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement, trading in influence, money-laundering and other similar activities.

15.1.2 "Bribe"

A "Bribe" is defined as the direct or indirect offer, authorization, gift or promise to give anything of value to a Government Official or other person, with the intent to obtain or retain business or gain an improper advantage. It includes facilitation payments.

15.2 Responsibilities

The following responsibilities are assigned to ensure appropriate definition, implementation, enforcement and update of relevant policy and procedure related to our anti-corruption efforts.

15.2.1 Governing Council

The Governing Council is responsible for ensuring the effective design, implementation and operation of the anti-corruption policy. The GC will also ensure that management is aware of and accepts the policy and that it is embedded in the organisational culture.

15.2.2 Director General

The Director General shall be responsible for ensuring that systems are in place to prevent corruption.

15.2.3 CFO

The Chief Financial Officer (CFO) shall be provided with sufficient authority to monitor all related activities, and shall have direct and prompt access to the Director General and to the Executive Committee of the GC to address any issues related to this policy. The CFO shall take steps to ensure that the financial controls are in place to minimise the risk of the organisation committing a corrupt act against a business partner, individual or organisation, or of any corrupt act being committed against the organisation by a business partner, individual or organisation.

15.2.4 The Organisation

The Organisation has implemented a code of conduct with an anti-corruption element, and shall continue to publicise the code internally.

15.2.5 Employees Assigned Financial Duties

All employees assigned any financial duties are to thoroughly familiarize themselves with this section of the Financial Manual and such other sections with any relevancy to their position. The CFO and the employee's individual manager are responsible for ensuring compliance with this provision.

15.3 Anti-Corruption and Employment Practices

In addition to the employment policies and procedures outlined in the Interpeace Employment Policy Manual (EPM), the below stipulations are to be adhered to by all employees of Interpeace.

15.3.1 Employee Vetting

Employees, particularly those in management positions or other posts where bribery and corruption may be a significant issue, shall be well vetted before they are employed to ascertain as far as is reasonable that they are the type of person who is likely to comply with the Organisation's anti-corruption policies and our values and working principles. This should include completion of appropriate background checks whenever specified for the position by the Head of Office.

15.3.2 Employment Contracts

Employment contracts shall include contractual obligations and penalties in relation to corruption with specific reference to bribery.

15.3.3 New Employees

New employees shall be informed of the Organisation's Code of Conduct to ensure that they understand the code and the importance of complying with it.

15.3.4 Conflict Of Interest

Employees shall be required to declare any conflict of interest in accordance with the EPM. Managers should monitor any potential conflicts of interest that may increase the risk of bribery and corruption.

15.4 Specifically Prohibited Actions

The following actions are specifically prohibited by any Interpeace employee:

The direct or indirect provision of cash or anything of value to a Government Official or commercial business contact to obtain an unfair business advantage or to obtain or retain business.

The acceptance of cash or anything of value from another person or entity seeking to do business with Interpeace. Except nominal value gifts as allowed by the Interpeace Gifts policy in the EPM.

Authorizing or providing travel benefits, gifts, entertainment, or political or charitable contributions for the benefit of a Government Official or commercial business partner without the required due diligence assessment and/or internal Interpeace business and legal approvals.

Making or authorizing "grease" or facilitating payments.

Making any incomplete, false or inaccurate entries on Interpeace's books and records.