ETHIOPIAID
TRANSFORMING LIVES IN ETHIOPIA

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Ethiopiaid

Bribery, Fraud and Corruption Policy

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Registered Charity No. 802353 (England)
Company Limited By Guarantee. 2435882 (England and Wales)

Registered with FUNDRAISING REGULATOR

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1. Statement

Ethiopiaid fully complies with the provisions of the UK Bribery Act 2010 and the Fraud Act 2006 and with other regulatory requirements and applicable guidance. Its trustees are required under charity law to safeguard the assets of the charity. Ethiopiaid does not tolerate bribery or corruption under any circumstances.

Employees, contractors and representatives of the charity are required to familiarise themselves and comply with this Policy, and any breaches of the Policy will be dealt with as a gross misconduct offence.

Ethiopiaid's core values also support its compliance with and commitment to the Bribery Act 2010. It is committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards.

Ethiopiaid requires all those receiving Ethiopiaid funds or representing Ethiopiaid, including its suppliers, grant recipients, partners, contractors and agents, to act in accordance with this policy.

Ethiopiaid has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that Ethiopiaid:

a) does not accept any level of fraud, bribery or corruption within the organisation or by any other individual or organisation receiving Ethiopiaid funds or representing Ethiopiaid; and
b) will always seek to take disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.

2. Definitions

2.1 Definition of bribery

Bribery is a criminal offence which principally arises in the following 3 circumstances:

- **Offering a bribe** - This includes the giving, promising, or offering of financial (e.g. money, vouchers) or other advantages (e.g. hospitality) to a recipient with the intention of inducing or rewarding them for improperly performing a function or task.

- **Receiving a bribe -** This includes requesting, agreeing to receive, or accepting a financial or other advantage in return for improperly performing any function or task related to Ethiopiaid's business and its activities.
- **Foreign Public Officials -** It is also a criminal offence to bribe a foreign public official. Ethiopiaid employees and representatives must not offer or provide any financial or other advantage to a foreign public official. In certain countries, it is often the local custom and practice to offer public officials 'facilitation payments' in order to hasten bureaucratic processes. Whilst this may not necessarily be unlawful in the foreign country in question, it is unlawful under the Bribery Act 2010 and Ethiopiaid employees and representatives must not make any such payments under any circumstances.
  If an Ethiopiaid employee, contractor or representative is asked by a foreign official to make any payments, they should contact the Executive Director or the Chair of Ethiopiaid immediately.

  Ethiopiaid employees, contractors and representatives must comply with the Policy and they must not offer any financial or other advantages (including any facilitation payments) to their local public officials.

2.2 Definition of Fraud

Fraud is knowingly making an untrue or misleading representation with the intention of making a gain for oneself or another or causing a loss, or risk of loss, to another.

2.3 Definition of Corruption

Corruption is the misuse of entrusted power for personal gain. This would include dishonest or fraudulent behavior by those in positions of power, such as managers or government officials. It would include offering, giving and receiving bribes to influence the actions of someone in a position of power or influence, and the diversion of funds for private gain.

3. Risk and Internal Control

a) Ethiopiaid will seek to assess the nature and extent of its exposure to the risks of internal and external fraud, bribery and corruption. It will regularly review these risks, using information on actual or suspected instances of fraud, bribery and corruption to inform its review.

b) Ethiopiaid will seek to put in place efficient and effective systems, procedures and internal controls to: encourage an anti-fraud culture; prevent and detect fraud, bribery and corruption; and reduce the risks to an acceptable level.

c) Ethiopiaid will seek to equip its employees, contractors and representatives with the skills, knowledge and expertise to manage its fraud risk effectively. It will provide adequate training to make employees, contractors and representatives aware of the risks of fraud, bribery and corruption, and of their responsibilities in preventing, detecting, and reporting it.

d) Ethiopiaid will make all those receiving Ethiopiaid funds or representing Ethiopaid, including its suppliers, grant recipients, partners, contractors and agents aware of this policy.

e) Ethiopiaid will work with relevant stakeholders, including comparable organisations, relevant regulators and government organisations to tackle fraud.

4. Code of Conduct

Ethiopiaid employees, contractors and representatives must not:

- Give, promise, or offer, a payment, gift or hospitality with the expectation or hope that an advantage of any kind will be received, or as a reward for an advantage already given;
- Give, promise, or offer, a payment, gift or hospitality to a government official, agent or representative to 'facilitate' or expedite a routine procedure (e.g. bureaucratic approval process for a licence application);
- Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain an advantage for them or someone else;
- Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that an advantage will be provided by Ethiopiaid in return;
- Threaten 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 lead to a breach of this Policy.

Any Ethiopiaid employee, contractor or representative found to have acted in any of the above ways will be subject to disciplinary action.

Records must be maintained of gifts, entertainment and hospitality, either offered or received in connection with the activity carried out for Ethiopiaid. This must include details of what it comprised, how it was delivered, who to, what its value was, and who in the supplier's business authorised it. Gifts, entertainment and hospitality with an actual or nominal value of greater than £50 would normally require prior authorisation by an appropriate person.

The following provides further guidance on some particular circumstances that may arise during the course of Ethiopiaid's business.

4.1 Receiving Gifts

On occasions, customers, suppliers, partners or beneficiaries may offer gifts to Ethiopiaid employees and representatives. No employee, contractor or representative should accept a gift or other reward from a third party as an inducement or reward to carry out business with that third party or to provide them with any other benefit.

For example, a partner could offer an employee a gift and request that the employee use their position to influence the grant making process. Any such offers should be politely declined and any gifts received should be returned.

Employees and representatives must also record the details of any gifts that have been offered or received.

On occasions, it may be acceptable for employees to retain gifts from a third party that are clearly not given with the intention of influencing. These items could include the following:

- Crafts made by beneficiaries of a supported project
- Certificates, pictures and cards

Any such items that are received should be recorded.

4.2 Receiving Invitations to Hospitality Events

It is also possible that employees, contractors and representatives might receive invites to hospitality events. Ethiopiaid does not prohibit employees or representatives attending normal and appropriate hospitality events which are clearly intended to just thank Ethiopiaid for its support or as an opportunity to discuss business matters further.

If you have any doubts as to whether to accept an invitation please discuss this with the Executive Director or the Chair of the Trustees.

In all instances, all offers and acceptances of hospitality must be recorded.

4.3 Offering Gifts and Hospitality

Employees and representatives are not permitted to offer or provide gifts or hospitality to any third party with the intention of receiving a benefit from that third party.

However, on occasion it may be acceptable to offer gifts or hospitality, provided that the value and nature of the gift or hospitality event is reasonable and appropriate to the circumstances. In all instances, offering gifts or hospitality must not be done with the intention of obtaining a business advantage from the third party or rewarding the third party for providing a business advantage.

If the intention of the gift or hospitality is simply to thank a client for its custom or, in the case of hospitality, to get some time with the third party to promote Ethiopiaid, then that is acceptable. If you are intending the gift or hospitality itself to influence the third party in making a decision, then that is not acceptable.

All gifts and hospitality offered must be recorded.

4.4 Donations to Organisations

Donations on behalf of Ethiopiaid should not be made to any charity partner organisation without the prior agreement of the Board of Trustees. The donation procedure is as follows:

- The allocation of grants to Ethiopiaid partners must be agreed in advance by the Board of Trustees.
- A partnership agreement must be signed between Ethiopiaid and the recipient partner organisation.
- Global payments are made using INTL FC Stone *(INTL is a public company regulated by the SEC. IFL is registered in England and Wales Company Number 5616586. Authorized and regulated by the Financial Conduct Authority (FCA) [FRN: 446717]).*
- A copy of the bank receipt must be received by Ethiopiaid from the recipient partner organisation.
- Monitoring of the grant(s) made takes place throughout the year, including a visit to the recipient organisation in Ethiopia.

Donations to political parties should not be made

4.5 Notifying Ethiopiaid of Concerns

If an employee or representative is concerned that acts of bribery are occurring or have occurred with Ethiopiaid, they should contact the Reed HR Department (who work closely with Ethiopiaid and its Board of Trustees) or follow the whistleblowing Policy as appropriate.

5. Monitoring and Preventing Bribery

Ethiopiaid is committed to ensuring that the company and its employees and representatives do not commit any unlawful acts of bribery. To prevent any such activities, Ethiopiaid adheres to the UK Government's Principles for Bribery Prevention in the following ways:

5.1 Top Level Commitments

Ethiopiaid operates a zero tolerance approach to bribery and any employee, contractor or representative found in breach of this Policy will be subject to disciplinary action for gross misconduct.

5.2 Risk Review and Monitoring

Ethiopiaid will review and monitor internal and external risks, and its processes and systems, on a regular basis. This is the responsibility of the Executive Director and Chair of the Board.

The organisations risk register will be kept up to date and reviewed at Board meetings.

Records of information relating to gifts or hospitality will be reviewed at Board meetings.

5.3 Due Diligence

Ethiopiaid will use due diligence to make certain that all those in the UK with whom it does business comply with the Bribery Act 2010.

5.4 Policies, Procedures and Implementation

Ethiopiaid will regularly review and communicate this Policy to all its employees, contractors and representatives. This Policy will be readily available. Mandatory training on this Policy will be undertaken, for a new starter this will be as part of their induction, and thereafter on an annual basis.

Please sign and date this form (below) to confirm that you have read, understood and are committed to Ethiopiaid's Anti-Corruption and Bribery Policy.

Name:

Signature:

Position:

Organisation:

Date: