

Anti Bribery Policy

Issued Date	11/28/2016
Applicable to	All employees
Update	10/05/2020

Anti Bribery Statement

Bribery is unacceptable for Women Political Leaders (WPL) and its employees: it is illegal, unfair, unethical, and detrimental to the reputation of all concerned. WPL operates a policy of zero tolerance of bribery in all its forms.

WPL has stringent policies and procedures for countering financial crime including, in particular, bribery and corruption. It also has systems and controls intended to prevent all such forms of financial crime occurring in any of its businesses.

Our policies are monitored continuously and reviewed periodically.

1. Who this Policy applies to

- 1.1. This policy applies to all WPL employees.
- 1.2. Temporary/agency staff
- 1.3. Self-employed or contract workers
- 1.4. interns and secondees; and
- 1.5. providers of outsourced services.

2. What is Bribery?

Bribery involves offering, giving, requesting or accepting a financial or other advantage with the intention of inducing the recipient to act improperly or as a reward for him/her having done so. A bribe may be paid directly or indirectly through a third party. It does not necessarily involve the giving of cash or a gift, and may include any item or act which confers a benefit or advantage of some description on the recipient or another person.

3. Specific Bribery

3.1. Foreign public officials

- (a) The general offences of paying and receiving bribes apply to any public officials and to private citizens alike.
- (b) Particular care needs to be taken when dealing with foreign public officials. “Foreign public official” extends much further than a government official, and includes anyone employed in the public sector, in whatever capacity.
- (c) All gifts and entertainment offered to public officials must be authorised in advance in accordance with this Policy and the board of foundation of WIP and the Compliance Officer.

3.2. Facilitation payments

- (a) A facilitation payment is a cash payment (or payment in kind) of a relatively small amount to a public official to “grease the way” and ensure that a routine official duty is performed.
- (b) Although facilitation payments are common in many countries, they are illegal under the Bribery Act and this policy.
- (c) WPL does not permit facilitation payments and any such payments will be deemed a breach of this Policy.

4. Reporting Bribery

If you:

- come across an incident of bribery;
- suspect that bribery has occurred or may occur; or
- become aware of information which suggests that bribery has occurred or may occur;
- suspect that a breach of systems and controls has occurred or may occur

this information must be reported immediately to the Compliance Officer.

5. Non-compliance

The consequences of non-compliance with this Policy are likely to be severe, both for WPL and for the individual(s) concerned. It could lead to criminal prosecution, civil recovery action and regulatory enforcement action.

Any employee who has committed a non-criminal breach of this Policy, such as failing to report a suspicion of bribery, or who has deliberately bypassed systems and controls, will be liable to disciplinary action.



If you have any questions about this Policy, its interpretation, or its application to potential activity, or if you would like to report a known or suspected violation of this Policy, please contact our Compliance Officer Stephanie Michel by email at stephanie@wpleaders.org