



## INDEPTH Anti-Corruption Policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and will implement and enforce effective systems to counter bribery.

Bribery and corruption are punishable for individuals and if INDEPTH Network is found to have taken part in corruption it could face damage to our reputation. Because of the global nature of INDEPTH, a single act of bribery or corruption can lead to criminal charges and fines for individuals and the Company in multiple countries. We therefore take our legal responsibilities very seriously.

We will abide by the anti-corruption laws in every country in which we operate.

### What is bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

### Examples:

- **Offering a bribe.** You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.
- **Receiving a bribe.** A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.
- **Bribing a foreign official.** You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as a request for a visa or work permit. Because this offer is made to gain a business advantage for

us, the offence of bribing a foreign public official has been committed as soon as the offer is made.

### **Gifts and hospitality**

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties provided that such hospitality is given or received in accordance with the INDEPTH Policy and provided that the following requirements are met:

- not made with the intention of influencing Staff to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- complies with local law;
- given in the Company's name, not in your name;
- does not include cash or a cash equivalent (such as gift certificates or vouchers);
- appropriate in the circumstances. For example, in Ghana it is customary for small gifts to be given at Christmas time;
- takes into account the reason for the gift, of an appropriate type and value and given at an appropriate time; and
- given openly, not secretly.

### **Facilitation payments and kickbacks**

We do not make, and will not accept, facilitation payments or 'kickbacks' of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine INDEPTH action by an INDEPTH official. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment.

### **Protection money**

In some parts of the world 'protection' is offered. This is a form of extortion which may involve physical threats. We will not pay protection money and you must report any such requests immediately. We have an obligation to ensure the safety and wellbeing of our employees, partners and agents and in certain circumstances may cease business in that territory or country.

### **Charitable donations**

We do permit charitable donations but these must not be offered to gain a business advantage. In some jurisdictions we permit our employees to volunteer for participation in community days.

### **Actions you should take**

- **Record keeping and reporting.** It is important that you keep records of any actions that could potentially be interpreted as bribery. This ensures that there is an appropriate paper trail to refer to in the event of prosecution. Likewise, report any actions to your manager. See the INDEPTH Whistleblower Policy for your protection.
- **Responsibilities for enforcement.** Managers are responsible for ensuring their teams are fully informed of policy requirements. Managers are also responsible for adopting and enforcing appropriate controls and taking the steps necessary to ensure compliance with this policy by all employees, distributors, and consultants.

### **How to raise a concern**

If you have any doubt or concern about any situation relating to the policy, seek guidance from your manager before doing or omitting to do anything that could compromise your position within the Company.

If any manager should require further guidance on a specific case then this should be referred to the Management Group.

### **What to do if you are a victim of bribery or corruption**

It is important that you tell a member of the Management Group as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

### **Sanctions to INDEPTH Staff who are victims of corruption**

The Executive Director will constitute a panel from amongst the Staff to investigate allegation of corrupt practices by a Staff.

If the committee's report is conclusive, the case is referred to the Disciplinary Committee of the Network which includes some Board Members.

The Disciplinary Committee may recommend sanctions ranging from,

- 1 Month suspension
- 12 Months suspension
- Termination of Contract with INDEPTH Network

Adopted by the INDEPTH Board in  
February 2010 in Accra