



POLICY ON ANTI-CORRUPTION

INTRODUCTION

It is UPP policy to conduct all of our work 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 dealings and relationships and in the promotion of UPP mission and vision.

Any UPP staff member who breaches this policy and related points in Standard of Conduct paragraph in Staff Handbook will face disciplinary action, which could result in dismissal for gross misconduct.

Any non-employee who breaches this policy (or we have reasonable suspicion to believe this is the case) may have their contract terminated with immediate effect.

This policy does form part of any employee/consultant's contract of employment and UPP may amend it at any time providing the commencement date in application of amendments allows time for alignment by the employee/consultant.

SCOPE OF APPLICATION

This policy applies to all people associable with UPP, or on UPP's behalf in any capacity, including employees at all levels, directors, officers, workers, volunteers, interns, agents, contractors, external consultants, board members, associates.

DEFINITIONS and RELEVANT ACTIONS

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way.

Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited.

If you are unsure about whether a particular act constitutes bribery, raise it with your direct manager (PM for project staff – HoO for PMs – HoM for HoO – General Director for HoM/CR and all the other staff members).

Specifically, you must not:

- a. *give or offer* any payment, gift, hospitality or other benefit in the expectation that a gain will be received in return, or to reward any commission received/awarded;
- b. *accept* any offer from a third party that you know or suspect is made with the expectation that UPP will provide an advantage for them or anyone else; or
- c. *give or offer* any payment (sometimes called a facilitation payment/fee) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- d. *threaten or retaliate against* another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.



It is encouraged that “business” or explorative meetings with local authorities and major donors representatives happen at the presence of 2 people from UPP, whenever this is feasible. In fact, the 2 people rule has been found effective in discouraging the offer or the acceptance of bribes on both sides.

GIFTS AND HOSPITALITY

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining UPP’s image or reputation, or promoting the UPP vision and mission.

A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a procurement process).

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the main reason for the gift.

Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret.

Gifts must be given in the name of UPP – not your own name.

Promotional gifts of low value such as UPP merchandise may be given to our existing suppliers, partners and referents at country level and we can accept equivalent gifts from them.

PROCEDURES

All UPP staff and associates must declare and keep a written record of all hospitality or gifts given or received.

All UPP staff and associates must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our administrative procedures recording the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers should be prepared with accuracy and completeness.

Accounts must not be kept “off-book” to facilitate or conceal improper payments.

REPORTING AND INVESTIGATION

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify following the procedures and instructions provided in Staff Handbook at paragraph 4.7.1 on “Reporting and Internal Investigation”.

Approved by the Executive Director

Novella Mori

On the 3rd January 2018.