

## RE:ACT Anti-Bribery Policy

RE:ACT operates a zero-tolerance approach to any attempts at bribery by, or of, its members (staff, interns and volunteers). Non-compliance with this policy by members representing RE:ACT is completely unacceptable, both in terms of the best use of donor's money and due to the risk of a criminal case being brought.

In line with the UK Bribery Act 2010 RE:ACT prohibits the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement:

- **to or from** any person or company, wherever they are situated and whether they are a public official or body or private person or company
- **by** any individual employee, volunteer, agent or other person or body acting on RE:ACT's behalf
- **in order to** gain any commercial, contractual or regulatory advantage for RE:ACT in a way which is unethical
- **or in order to** gain any personal advantage, financial or otherwise, for the individual or anyone connected with the individual.

The act imposes criminal liability on individuals and organisations in the event that employees, subsidiaries, agents or consultants pay or accept bribes in relation to the organisation's business anywhere in the world.

RE:ACT's zero tolerance of bribery and corruption applies to all trustees, officers, directors, employees, volunteers, interns, consultants, contractors and personnel as well as any agents, contractors, representatives or other parties acting on behalf of RE:ACT, in any country where we may operate.

RE:ACT recognises that market practice varies across the territories in which we do business and what is normal and acceptable in one place may not be in another. This policy is not meant to prohibit the following practices providing they are customary in a particular market, are proportionate and are properly declared and recorded:

- normal and appropriate hospitality
- the giving of a ceremonial gift on a festival or at another special time
- use of any recognised fast-track process which is available to all on payment of a fee
- the offer of resources to assist a person or body to make a decision more efficiently, provided that they are supplied for that purpose only.

Inevitably, decisions as to what is acceptable may not always be easy. If at any time you are in doubt as to whether a potential act constitutes bribery, the matter should be referred to a RE:ACT Director or in-country manager.

The prevention, detection and reporting of bribery is the responsibility of each individual working on behalf of RE:ACT. RE:ACT encourages all members to report any suspected bribery activity to a responsible person within RE:ACT (refer also to the RE:ACT Whistleblowing Policy). You will be fully supported if you make a report of suspected bribery in good faith even if, following an investigation, there is no finding that bribery took place. Any breaches of this policy will be dealt with in accordance with the RE:ACT Discipline Policy.

## **Policy Review**

This policy will be reviewed annually, or sooner if there has been a breach. The review will ensure the policy remains up-to-date in line with UK legislation and best practice, as well as assessing the effectiveness of how the policy is working in practice and taking action to address any identified issues.