



Anti- Bribery Policy

1. Introduction

This anti-bribery policy exists to set out the responsibilities of VVOB and those who work for VVOB and other persons associated with VVOB in regard to observing and upholding VVOB's zero-tolerance position on bribery and corruption. Besides, it exists to act as a source of information and guidance for those working for VVOB. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, subgrantees, subcontractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, board members, agents, sponsors, or any other person or persons associated with VVOB (including third parties), no matter where they are located.

In the context of this policy, third-party refers to any individual or organisation VVOB meets and works with. It refers to actual and potential donors, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangement VVOB makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

2. Policy statement

VVOB is committed to conducting activities in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. VVOB has zero-tolerance for bribery and corrupt activities. VVOB is committed to acting professionally, fairly, and with integrity in all business dealings and relationships in all the countries it operates.

VVOB will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which it operates.

VVOB recognises that bribery and corruption are punishable. If VVOB is discovered to have taken part in corrupt activities, it may be subjected to fines, be excluded from tendering for public contracts, and face serious damage to its reputation. It is with this in mind that VVOB commits to preventing bribery and corruption in its activities.

3. Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. Bribery is not limited to the act of offering a bribe, but also covers an individual receiving and accepting a bribe.

A *bribe* refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not accepted by VVOB. Employees can not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They cannot bribe anyone anywhere in the world. They cannot accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the company's compliance manager.

4. What is acceptable and what is not?

4.1. Gifts and hospitality

VVOB accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with local laws and regulations.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the circumstances (e.g. giving small end-of-year gifts or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value (usually in excess of €100). This value is pre-determined by the compliance manager.
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of VVOB.

Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

VVOB recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

As good practice, gifts given and received should always be disclosed to VVOB. Gifts from suppliers should always be disclosed.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought.

4.2. Facilitation payments

VVOB does not accept and will not make any form of facilitation payments of any nature and recognises that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action.

4.3. Donations

VVOB will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. VVOB recognises this may be perceived as an attempt to gain an improper business advantage.

5. Employee Responsibilities

5.1. Prevent

As an employee of VVOB, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

All employees are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy. They must create an environment where concerns can easily and safely be raised and discussed.

Employees must make sure they are not involved in awarding benefits, contracts for goods or services, employment or promotion within VVOB, to any person with whom the employee has a financial, personal, family (or close intimate relationship) interests. They must declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of VVOB.

Employees must not accept significant gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to the employee as a result of our work with VVOB. In no case gifts may influence or give the impression of influencing decision-making of the individuals who are involved in implementing VVOB projects and programmes in performing her or his job.

5.2. Report and respond

If any employee has reason to believe or suspects that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, he or she must notify the compliance manager. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. VVOB has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

In case any staff member or other person associated with VVOB, either by himself or through a partner organisation, becomes aware of possible cases of irregularity, fraud or corruption, it is his or her duty to inform without delay the compliance manager. VVOB has not assigned the function of compliance manager to one specific person for the entire organization.

The person or persons who raise a concern can decide to inform the following persons:

- The *Programme Manager* or the *Deputy Programme Manager* of the country office;
- The *Director-General* of VVOB.

The *Director-General* should be contacted:

- In case the Programme Manager or Deputy Programme Manager is either not available, involved or not neutral;
- In case the staff considers it useful;
- In case contacting the Programme Manager or Deputy Programme Manager is difficult.

Which person the person prefers to inform about the suspicions or allegations, is left up to him or her. Indeed, every member of staff, whether permanent or not, has a clear right to approach the DG directly, without passing through the hierarchy. If in doubt regarding the situation of irregularity, the person can consult the Programme Manager. This consultation is optional and does not constitute any obligatory step in the procedure. It goes without saying that this consultation remains strictly confidential.

In case a staff member communicated a situation of irregularity, and this out of concern for the organisation's wellbeing as agreed in the signed form of acceptance of code of conduct, then this staff member shall in no way suffer inequitable or discriminatory treatment as a result of having communicated such information.

However, in case a staff member made false allegations about another colleague, with the aim of purposively bringing that colleague into discredit, and this has become obvious after investigation, in that case disciplinary sanctions shall be taken towards the staff member who brought forward the information.

The Programme Manager or Deputy Programme Manager or Director-General who have been informed shall, after thorough analysis, and after hearing all parties, optionally by an external auditor, take a decision on corrective measures and ensure the communication to the donor and the Board of Directors and other relevant parties.

In any case, it is advised that a thorough analysis is conducted, hearing all parties.

6. Training

VVOB will provide relevant anti-bribery and corruption training to employees etc. where it feels their knowledge of how to comply with the Bribery Act needs to be enhanced.

7. Record keeping

VVOB will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. VVOB employees will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

8. Monitoring and reviewing

VVOB is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular base. It will assess its suitability, adequacy, and effectiveness.

Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.

This policy does not form part of an employee's contract of employment and VVOB may amend it at any time so to improve its effectiveness at combatting bribery and corruption.



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