



## **Anti-Bribery & Anti-Corruption Policy**

4 April 2018

### **What does the policy cover?**

This anti-bribery and anti-corruption policy exists to set out the responsibilities of the Institute of Natural Resources (INR) and those who represent it in regards to observing and upholding our zero-tolerance position on bribery and corruption.

### **Policy statement**

The INR is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery and corruption are prevented. We have zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

The INR will constantly uphold all laws relating to bribery and corruption in all the jurisdictions in which we operate. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

## **Who is covered by the policy?**

This policy applies to all employees (whether temporary, fixed-term, permanent or interns), board members and sub-contractors.

## **Definition of bribery and corruption**

Bribery and corruption:

1. 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.
2. Refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage
3. Is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and he/she accepts it, he/she is also breaking the law
4. Is illegal.

## **Facilitation Payments and Kickbacks**

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

The INR does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

## **Political Contributions**

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

## **Charitable and Pro Bono Contributions**

The INR accepts the act of donating to charities and other deserving institutions – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and discloses all contributions it makes. Employees must take care to ensure that these contributions are not used to facilitate or conceal acts of bribery.

## **Responsibilities**

As an employee or subcontractor of the INR you must ensure that you read, understand, and comply with the information contained within this policy. All employees and those under our control 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 policy. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Executive Director. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The INR has the right to terminate a contractual relationship with an employee or sub-contractor if they breach this anti-bribery policy.

## **What happens if there is a need to raise a concern?**

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to the INR, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should discuss it immediately with the Executive Director. You must inform the Executive Director as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, the INR understands that you may feel worried about potential repercussions. We will support anyone who raises concerns in good faith under this policy even if investigation finds that they were mistaken. We will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

## **Communication**

The INR's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

## **Monitoring and reviewing**

The INR's Executive Director is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. He/she 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 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 Executive Director.

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