



AFRICAN-EUROPEAN PARLIAMENTARIANS INITIATIVE

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Approved by the Management Board on 19th April 2021

1. What this policy covers

1.1 This Anti-Bribery & Corruption Policy exists to set out the responsibilities of AEPI and those who work for AEPI with regard to observing and upholding our zero-tolerance position on bribery and corruption.

1.2 It also exists to act as a source of information and guidance for those working for AEPI. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. Policy statement

2.1 AEPI is committed to conducting business ethically and honestly and is committed to implementing and enforcing systems that ensure bribery is prevented. AEPI has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all dealings and relationships.

2.2 AEPI will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the Netherlands in regards to our conduct both at home and abroad.

2.3 AEPI recognises that bribery and corruption are punishable by imprisonment and/or a fine. If AEPI is discovered to have taken part in corrupt activities, we may be subjected to a fine, be excluded from tendering for public contracts, and face serious damage to our reputation. We commit to preventing bribery and corruption in our organisation and take our legal responsibilities seriously.

3. Who is covered by the policy

3.1 This anti-bribery policy applies to all consultants, contractors, trainees, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), no matter where they are located. The policy also applies to Officers, Management Board, Advisors and/or Committee members at any level.

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

3.3 Any arrangements AEPI 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.

4. Definition of bribery

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage to induce or influence an action or decision.

4.2 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.

4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

4.4 Bribery is illegal. Consultants must not engage in any form of bribery, whether it be directly, passively, or through a third party. They must not bribe a foreign public official anywhere in the world. They must not 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 AEPI's Director Operations.

5. What is and what is NOT acceptable

5.1 Gifts and hospitality

AEPI 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:

- a. 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;
- b. It is not made with the suggestion that a return favour is expected;
- c. It is in compliance with local law;
- d. It is given in the name of the organisation, not in an individual's name;
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate);
- f. It is appropriate for the circumstances (e.g. giving small gifts around religious festivities or as a small thank you to an organisation for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift;
- h. It is given/received openly, not secretly;
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them;
- j. It is not above a certain excessive value, as pre-determined by the company's compliance manager (usually in excess of Euro 50,-);
- k. It is not offered to, or accepted from, a government official or representative or politician or political party without the prior approval of AEPI's Director Operations.

5.2 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 Director Operations, who will assess the circumstances.

5.3 AEPI 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.

5.4 As good practice, gifts given and received should always be disclosed to the Director Operations. Gifts from suppliers should always be disclosed.

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

5.6 Facilitation Payments and Kickbacks AEPI 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.

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

5.9 AEPI is politically unaffiliated and will not make political donations, whether in cash, kind, or by any other means, to support any political parties or candidates.

6. AEPI Consultant Responsibilities

6.1 As a consultant of AEPI 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.

6.2 All consultants 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.

6.3 If a consultant has reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, they must notify the Director Operations or a member of the Management Board as soon as possible.

6.4 AEPI will terminate an agreement with a consultant if they breach this Anti-Bribery & Corruption Policy.

7. Raising a concern

7.1 If you suspect that there is an instance of bribery or corrupt activities occurring in relation to AEPI, 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 speak to the Director Operations or a member of the Management Board.

7.2 If you are a victim of bribery or corruption, you must tell the Director Operations or a member of the Management Board 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.

7.3 If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, AEPI understands that you may feel worried about potential repercussions. AEPI will support anyone who raises concerns in good faith under this policy, even if an investigation finds that they were mistaken.

7.4 AEPI 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. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

7.5 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Director Operations or a member of the Management Board.

8. Communication

8.1 All consultants AEPI hires, for whatever period, will be required to read this policy and sign that they have read it and will comply with it. Signed copies will be archived by the AEPI Administrator.

8.2 AEPI's Anti-Bribery & Corruption Policy and zero-tolerance attitude will be clearly communicated to all partners, suppliers, contractors and any third-parties at the outset of relations and as appropriate thereafter.

8.3 AEPI's Anti-Bribery & Corruption Policy will be placed on its website where all can find it.

9. Record keeping

9.1 AEPI will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We 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.

10. Monitoring and reviewing

10.1 AEPIs Management Board will review the implementation of this policy on a regular basis.

10.2 Any need for improvements will be applied as soon as possible. Consultants 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 Director Operations.

10.3 This policy does not form part of a consultancy agreement and AEPI may amend it at any time so to improve its effectiveness at combatting bribery and corruption.