Anti-Bribery Policy

Policy Statement

IRARA is committed to conducting its activities honestly, fairly, and with integrity. We operate a zero-tolerance approach to bribery and are committed to preventing, detecting, and addressing any form of bribery or unethical conduct.

No employee, partner, or representative acting on behalf of IRARA may offer, give, request, or accept a bribe or any other improper inducement.

All individuals acting on behalf of IRARA are expected to uphold the highest ethical standards and comply with this policy, applicable laws, contractual obligations, and donor requirements.

Scope

This policy applies to:

- IRARA Services Limited (UK), IRARA vzw (Belgium), IRARA pvt Limited (Pakistan) and all other subsidiaries and affiliate organisations (collectively "**IRARA**");
- Members of IRARAs' Boards of Directors, officers, management, employees, seconded employees, interns and volunteers (collectively "**Employees**"); and
- Subgrantees, partner organisations, contractors, outside experts, consultants, agents, representatives and any other organisation or individual that acts on IRARAs' behalf or at IRARAs' direction (collectively "**Partners**").

The policy applies in all countries where IRARA operates and to all activities, programmes, projects, procurement, recruitment, fundraising and business dealings.

Responsibilities

Employees must:

- Comply with this policy and complete mandatory anti-bribery training
- Act ethically, transparently and with integrity at all times
- Report any suspected bribery and/or conflict of interest promptly

Managers must:

- Lead by example
- Ensure compliance within their teams
- Report/handle concerns promptly
- Maintain effective controls

IRARA will:

- Promote a strong anti-bribery culture
- Assess and escalate concerns as necessary
- Ensure appropriate investigations are conducted and suitable outcomes occur

Purpose

The purpose of this policy is to:

- Prevent bribery and unethical conduct
- Protect IRARA's reputation and resources
- Ensure compliance with applicable anti-bribery legislation
- Promote a culture of honesty, accountability, and transparency
- Provide guidance on reporting suspected bribery

Definitions

Bribery: the offering, promising, giving, requesting, agreeing to receive, or accepting of money, gifts, services, favours, or any other advantage intended to influence a decision or secure an improper benefit or obtain an improper advantage.

Conflict of interest: a situation where a person or their immediate family/friends have a personal, professional or business interest that may conflict with, or appear to conflict with, the best interests of IRARA.

Corruption: The abuse of entrusted power or position for private gain.

Embezzlement: intentional and unauthorised keeping of property or funds by a person who was not authorised to keep them for personal purposes.

False claim: knowingly presenting, or causing to be presented, a false or fraudulent claim for approval and/or payment. This may include failing to correct a mistake if discovering something that makes a claim false.

Fraud: Deliberate deception intended to secure financial, personal, or organisational gain.

Facilitation Payment: An unofficial payment made to secure or expedite routine government or administrative actions.

Theft: the unauthorised taking of any form of property or money.

Prohibited Conduct

No person acting on behalf of IRARA may:

- Offer, promise, or give a bribe
- Request, receive, or accept a bribe
- Make or receive facilitation payments
- Use organisational funds for improper purposes
- Offer gifts or hospitality intended to influence decisions
- Use third parties to make payments or provide benefits that would otherwise be prohibited
- Falsify financial, procurement, or operational records
- Abuse their position for personal gain
- Award contracts, grants, or opportunities based on personal relationships or improper influence
- Conceal or falsify records relating to payments, gifts, or expenses
- Conceal conflicts of interest
- Engage in fraud, theft, embezzlement, or misappropriation of assets

Ignorance of this policy is not an acceptable defence.

Conflicts of Interest

All employees, partners, and representatives must:

- Act in IRARA's best interests
- Avoid situations where personal interests conflict, or could appear to conflict, with organisational interests
- Declare actual, potential, or perceived conflicts of interest promptly

Declared conflicts will be recorded and managed appropriately.

Facilitation Payments
IRARA prohibits facilitation payments.
Facilitation payments are unofficial payments made to secure or expedite routine actions by public officials or other individuals.
Any request for such a payment must be reported immediately to a manager and recorded.

Gifts and Hospitality
Reasonable and proportionate gifts or hospitality may be accepted or provided where they:

- Are lawful and appropriate
- Are not intended to influence decisions
- Are openly declared
- Do not create an actual or perceived conflict of interest or appearance of impropriety

The following are prohibited:

- Cash gifts or cash equivalents.
- Gifts linked to procurement, recruitment, tendering, funding, or contract decisions.
- Excessive, lavish, or frequent hospitality.

All gifts or hospitality must be declared and agreement of acceptance must be given in writing by a director before being accepted.

Reporting Concerns
Any individual who suspects any form of corruption must report it immediately to the appropriate person. This might be their line manager, a director or HR.

Reports may be made confidentially and will be investigated appropriately. Failure to report known or suspected bribery may itself be treated as misconduct.

Handling Allegations
IRARA may but are not limited to the following actions:

- Suspend duties pending investigation where necessary
- Refer matters to statutory agencies
- Refer individuals to professional or regulatory bodies
- Take disciplinary action up to and including dismissal
- Suspend or stop contract/s

Breaches of Policy
Failure to comply with this policy may result in disciplinary action, up to and including dismissal where appropriate, termination of contracts or partnerships, recovery of losses, criminal or civil proceedings and/or reporting to relevant authorities.

This policy is reviewed regularly to ensure it remains compliant and aligned with best practice.