



Global Compact
Network UK

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Anti-bribery and anti-corruption policy

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Global Compact Network UK's anti-bribery and anti-corruption policy

Introduction

The Global Compact Network UK (henceforth 'GCN UK', 'company', or 'we') is committed to foster a culture of zero-tolerance in respect of any form of bribery and corruption. This policy sets out the responsibilities of GCN UK in regard to observing and upholding this position.

It also exists to act as a source of information and guidance for Employees (as defined by Section 1 of this policy), helping them to recognise and deal with bribery and corruption issues, as well as understanding their responsibilities.

Principle 10 of the UN Global Compact establishes a fundamental responsibility for all responsible businesses, large and small, to work against all forms of corruption, including extortion and bribery. We take these responsibilities seriously and are committed to ensure our Employees are properly informed.

1. Scope

All individuals and organisations working for/with the Global Compact Network UK are required to comply with this policy. This includes Trustees, members of the Advisory Group, employees, interns, consultants, and contractors (henceforth 'Employees').

This policy is explicitly mentioned in all contracts of employment and will be included in any contractual arrangement our company makes with a third party.

2. Policy Statement

The Global Compact Network UK is committed to:

- Conduct its operations in an ethical, legal, and honest manner, consistent with its values and mission.
- Implement and enforce systems that ensure prevention of bribery.
- Constantly uphold all laws relating to anti-bribery and anti-corruption. (In this respect, we are bound by the laws of the UK, including the [Bribery Act 2010](#), both at home and abroad.)
- Foster an organisational culture of zero-tolerance on bribery and corruption.

3. Definitions

The Bribery Act 2010 defines bribery as:

- The act of offering, giving, promising, something of value (such as money, gifts and hospitality, job offers, lavish treatment during a business trip, or tickets to an event) in return for an action that is illegal, unethical, or a breach of duty.
- The act of accepting or soliciting something of value in return for an action that is illegal, unethical, or a breach of duty.

Other common definitions include:

- *Facilitation payments* – a form of bribery that involves usually unofficial payments to a government official to expedite or facilitate the performance of a certain duty or action (e.g., release of goods at customs, obtaining visas or permits).
- *Extortion* - the unlawful use of one's position or office to obtain money through coercion or threats.
- *Gifts and hospitality* - these can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays, meals, accommodation, etc.). Extravagant gifts and hospitality may be used to disguise bribes that are intended to induce improper behaviour.

For an offence to take place, the recipient doesn't need to have accepted the offer or taken the action. It is sufficient for the bribing party to intend to influence improperly their actions.

When an individual genuinely believes their safety or liberty is threatened, the acts described above are unlikely to be deemed to be a bribe.

4. Risk assessment

Key areas of risks identified for the GCN UK are:

- Gifts
- Hospitality
- Overseas travel (facilitation payments)
- Conflict of interest

The GCN UK will conduct periodic bribery and corruption risk assessments and update their policy procedures as necessary.

5. Policy procedures

The following procedures are designed to mitigate the risks identified by the risk assessment.

5.1. Gifts and hospitality

GCN UK accepts normal and appropriate hospitality and gifts (whether given to/received from third parties) for the purposes of building new business relationships or maintaining existing ones.

No Employee (as defined in Section 1 of this policy) should accept any gift or hospitality that may influence or could be perceived to influence an improper performance of their function.

Therefore, the giving and receiving of hospitality and gifts is acceptable when:

- It is not made with the suggestion that a favour is expected in return;
- It is given in the name of the organisation, not in an individual's name;
- It does not include cash or a cash equivalent (e.g., a voucher);
- It is appropriate for the circumstances (e.g., a company hosts our events or meetings, giving small gifts around Christmas);

- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift (e.g., you have spoken at an event and the host sends you a plant to thank you).

All gifts and hospitality should be recorded in the Gift and Hospitality Register.

All gifts and hospitality known (or suspected to be) of value greater than £50 should be approved in writing by each individual's line manager and recorded in the Gift and Hospitality Register.

It is responsibility of each individual and ultimately their line manager to ensure that this action is completed.

5.2. Overseas travel (Facilitation payments)

The GCN UK does not accept and will not make any form of facilitation payments as defined in Section 3 – except in circumstances where an Employee's safety is at risk.

In circumstances where Employees were not able to avoid a facilitation payment, they should:

- Try to keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- If possible, obtain approval from Senior Management or otherwise report the incident as soon as possible to the Operations Manager and/or the Executive Director.

5.3. Conflict of Interest

Conflict of interest occurs when an Employee may take or be perceived to take decisions based on personal interest rather than the company's interest. This may be a form of corruption.

All Employees are expected to declare any such conflicts or potential conflicts to the Operations Manager (or to the Executive Director if the concern is about the Operations Manager) before any meeting or process, such as a recruitment process, to which the conflict or potential conflict is relevant. In the case where the conflict relates to the Executive Director, he/she should inform the Chair of GCN UK.

The disclosed conflict will be assessed by the Operations Manager and/or the Executive Director and/or the Chair (where the conflict is related to the Executive Director), who will decide the appropriate approach to deal with it. The assessment may determine the absence of a conflict, may lead to the exclusion of this person from the meeting or process, or to the limitation of their decision-making power.

Examples of conflicts of interest:

- A Manager involved in the hiring of a new role discovers that a friend has been shortlisted;
- A Project Manager favours a potential event sponsor because they previously worked for that company;
- A Senior Manager engages a family member/friend to work on a project without regard to their qualifications or suitability.

Our [Articles of Association](#) contain special provisions on managing Trustee's conflicts of interest.

All declared conflicts will be recorded in a Conflicts of Interest register.

6. Investigation

Any instances of actual or potential bribery reported as described in Section 5 and 8 of this policy will be properly and promptly investigated to:

- Confirm whether or not a bribe has taken place, and to identify who was responsible.
- Confirm whether internal controls and anti-bribery procedures have worked in practice.
- Identify any improvements required to anti-bribery procedures.

Depending on who is directly or indirectly involved in the incident, the Operations Manager, Executive Director, or the GCN UK Chair will determine the appropriate subsequent action, depending on the findings of the investigation. This may include disciplinary procedures and external reporting (e.g., to the appropriate authorities).

7. Employees' responsibilities

Employees are expected to:

- Read, understand, and comply with this policy, and with any training or information about anti-bribery and anti-corruption they are given.
- Prevent, detect, and report any instances of bribery and other forms of corruption as described in Section 5 and 8 of this policy.
- Avoid any activities that could lead to, or imply, a breach of this policy.

8. Training and communication

- GCN UK will integrate this policy in the induction process for all new Employees.
- All employees will be informed about this policy in their contract of employment. However, this policy will not form part of their contract and the GCN UK may amend it at any time to improve its effectiveness.
- Where deemed necessary, employees will receive additional training on how to adhere to this policy.
- A clause describing our zero-tolerance of bribery and corruption will be included in all contractual arrangements with third parties (including suppliers, partners, and sponsors).

9. Raising questions or concerns

Unless otherwise indicated in the procedures outlined in Section 5, employees who have any reason to believe or suspect that an instance of bribery or corruption in breach of this policy has occurred or will occur, should notify as soon as possible their line manager, followed by the Operations Manager, and ultimately the Executive Director (ED). Such concerns should be raised as outlined in our Whistleblowing Policy.

Should employees be uncertain about whether something is a bribe, a gift or act of hospitality, facilitation payment, or conflict of interest, they must seek further advice from their line manager, followed by the Operations Manager, and ultimately the Executive Director.

10. Protection

GCN UK will strive to ensure that no one suffers any detrimental treatment (i.e., dismissal, disciplinary action, or unfavourable treatment) resulting from refusing a bribe or other forms of corruption, or from raising concerns about potential instances of bribery or corruption.

Should employees believe that they have been subject to any detrimental treatment in the cases outlined above, they should immediately notify a line manager, followed by the Operations Manager, and ultimately the Executive Director or Chair of GCN UK as set out in our Whistleblowing Policy.

11. Record keeping

- The UN Global Compact Network UK keeps detailed and accurate financial records and has appropriate internal controls in place to act as evidence for all payments made.
- Recognising that bribery might occur despite a zero-tolerance policy, we will declare and keep a written record of any attempted or actual bribes offered, made, solicited, or received.
- All accounts, invoices, agreements, and other documents relating to dealings with third parties such as partners, suppliers, and sponsors, must be prepared and maintained with accuracy and completeness. No accounts must be kept 'off-book' to facilitate or conceal improper payments.

12. Monitoring and reviewing

- The Operations Manager is responsible for monitoring the effectiveness of this policy.
- This policy will be reviewed regularly by GCN UK's Trustees to ensure it remains up to date and effective.
- The policy may also be reviewed if legislation changes or if monitoring information suggests that policy or practices should be altered.
- 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 Operations Manager.

The UN Global Compact Network UK

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