

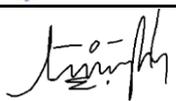


## **ANTI-CORRUPTION AND ANTI-BRIBERY POLICY**

Issue Date	Issue No.	Obsolete/Current/Archived	Reason/Notes
15/02/2022	001	Current	Reviewed and approved

### REVIEWERS AND APPROVALS

This document has been reviewed and approved by the undersigned.

Name	Position	Signature	Date
Prof. E. Gyimah-Boadi	Board Chair		12/09/2022
Joseph Asunka	Chief Executive Officer		12/09/2022
Felix Biga	Chief Operating Officer		12/09/2022
Kwaku Owusu-Yeboah	Human Resource Manager		12/09/2022

### OWNERSHIP/CUSTODIAN OF THE POLICY

This policy document is vested in the Chief Executive Officer, who has overall responsibility for its implementation in line with Afrobarometer's (AB's) legal and ethical obligations, monitoring its effectiveness, and dealing with queries with regard to its interpretation.

Supervisors at all levels are responsible for ensuring their direct reports are made aware of the policy and adequately trained on its application.

This policy document shall be subject to review every year or as required to keep it up to date with changes to relevant regulations or best practice. All suggestions for review and amendment shall be forwarded to the Human Resources Manager, the Chief Operating Officer, or the Chief Executive Officer for review, including obtaining Management/Board approvals of the amended policy.

### **DISTRIBUTION LIST**

A current version of this document is available to staff on the Google drive labeled “Policies” and on the AB website.

### **POLICY OBJECTIVE**

This policy establishes AB’s global standards regarding the prevention of corruption. If local laws or regulations have stricter requirements, those laws supersede the requirements stated in this policy. AB and its affiliated entities worldwide are committed to doing business with integrity and the highest anti-corruption standards. All AB employees, partners, and suppliers are expected to conduct themselves with honesty, fairness, and high ethical standards, as well as to abide by all anti-corruption/anti-bribery laws and avoid even the perception of impropriety.

As a continental enterprise, AB must comply with all applicable laws, including anticorruption laws, around the world. These laws set prohibitions against giving bribes to government officials, books and records requirements, and criminal and civil penalties for violations. Some laws apply strict liability standards, expand the scope to include giving and receiving bribes, and even apply to private-sector individuals as a form of commercial bribery.

### **POLICY STATEMENT**

In alignment with laws around the world, we at AB do not promise, offer, give, or authorize, directly or indirectly, a bribe or anything of value to anyone – including any government official/employee, representative of a government (including state-owned enterprises and state-controlled entities), private (non-government) officials, or employees of any business – to attempt to improperly influence any act or decision to obtain or retain business, or to secure any improper advantage for AB. AB or its employees and partners also do not accept anything of value given as part of an attempt to improperly influence decision(s).

Corruption violates the public's trust, threatens economic and social development, and hurts fair trade. To combat corruption, most countries have enacted anti-corruption/antibribery laws and regulations. These laws make it a crime to give, pay, or promise "anything of value" (bribes) to:

- influence an act or a decision to obtain, retain, and/or direct business, or
- secure an improper advantage of any kind.

It is also a crime to accept "anything of value" (bribes) in these circumstances.

### **What is a Bribe?**

A bribe is not just cash in an envelope passed under a table. International laws and AB policy define a bribe as "anything of value," such as gift cards, home repairs, tickets to a theater or sporting event, guest passes to a private club, a no-bid contract, a summer job for a teenage family member, free limo/courtesy car service rides, and more, where given to obtain an improper advantage. Just offering a bribe is a violation, even if the transfer does not occur.

Third parties (also called "intermediaries") cannot be used to try to hide bribery. Suppliers, agents, consultants, distributors, and business partners cannot offer or receive a bribe related to working for AB or on AB's behalf. An AB employee's inducing, facilitating, or causing a third party to act in violation of this policy constitutes a violation of this policy. An AB employee's awareness of such an act constitutes a violation of this policy unless the employee reports the act to his/her superiors (see "Handling of Suspected and Reported Violations" below).

### **Gifts and Entertainment**

AB recognizes that, when conducted appropriately, informal interactions and exchanges of gifts or other offerings may be an important part of building goodwill and developing relationships with customers, partners, and suppliers, and that in many countries, this may be an accepted and appropriate business protocol and custom. However, if conducted inappropriately, gifts, travel, entertainment, and other offerings may violate applicable laws or the policies or principles of AB, funders, or other third parties.

The AB Code of Conduct Policy sets out the requirements for an acceptable gift or other offering, with disclosure and pre-approval guidelines. As a general rule, all gifts and other offerings must be handled transparently and in the right way so that they do not create even a perception of impropriety. The giving or receiving of gifts and other offerings must

be appropriate (i.e. not cash, gift cards, or other prohibited types; not an attempt to unduly influence a business outcome; and otherwise in compliance with all laws, regulations, and policies), must be of reasonable value, and may need to be disclosed and pre-approved.

### **Facilitation Payments**

A “facilitation payment” is a payment to a government official designed to secure or speed up a routine government action to which the applicant is entitled, such as processing a visa, scheduling an inspection, securing a sample frame or a delivery, or getting utilities connected. This is sometimes described as “greasing the wheels” or “grease payments.”

Except as described below, AB does not permit the payment of facilitation payments anywhere in the world. Facilitation payments are also expressly prohibited, and treated as bribes, by certain anti-corruption laws (UK, Canada, Brazil, etc.) and many anti-corruption conventions (such as the Organisation for Economic Cooperation and Development (OECD) Convention).

### **Limited Exceptions**

If personal safety, security, or freedom of movement is at risk, a facilitation payment may be made and then reported to the AB Project Management Unit after the fact.

In any other situation, a facilitation payment may only be paid as a final resort and with approval by the AB CEO (and with approval within your management chain at the level of Director or above, and disclosure to your finance support lead) if all of the following conditions are met:

- There is no alternative, and the expected delay will have a significant impact on the business.
- It is in a country or situation in which such payments are customary and not prohibited by law.
- The amount is modest given the facts and circumstances of the situation.

Any facilitation payments must be accurately described and documented in the appropriate accounting books and records as “facilitation payments.”

### **Charitable and Political Contributions**

To avoid the possible appearance of impropriety, AB does not give or allow any charitable or political donations. No AB funds shall be donated to charity, political parties or candidates.

### **Books and Records**

To prevent attempts to hide bribery through incomplete or false documentation, many anticorruption laws have criteria for books, records, and internal financial controls. AB and its partners are required to keep books and records that accurately and completely reflect transactions, assets, and financial positions. The requirement includes forms for processing payments, attachments and backup used to justify payment requests, and authorizations and classifications of payments by accounting codes.

In addition, AB prohibits undisclosed or unrecorded funds, or "off-the-books funds." These are any funds inappropriately established or retained in a non-AB account (including an account of a partner, agent, supplier, or consultant) where the use of the funds continues to be directed by an AB employee without proper transparency, authorization, documented terms and conditions, and appropriate accounting treatment on AB's books and records in accordance with its policies.

### **Penalties**

Violations of anti-corruption laws can lead to criminal, civil, and regulatory penalties, including fines and jail. Even the perception of impropriety can damage the reputation of AB and its employees, and will not be tolerated by AB. An employee who violates anticorruption laws or this policy will face disciplinary action, which may include termination of employment.

### **Handling of Suspected and Reported Violations**

If you suspect any suspicious internal or third-party bribery or corruption activity or are unsure whether a particular act constitutes bribery or corruption you must raise your concerns. This can be done either directly with the CEO's office, your supervisor/manager or via the AB Whistleblowing Reporting Line.

All allegations relating to a breach or suspected breach of an applicable law or this Policy will be investigated by AB.

The AB Whistleblowing Policy sets out the process that will then be followed and the protections that a Whistle-blower can expect should they raise such a concern or complaint in relation to any actual or suspected breach of this Policy. Any suspected retaliation should be reported immediately.

**STAFF DECLARATION**

I have read and understood the Anti-Corruption and Anti-Bribery Policy of Afrobarometer. I understand that if I act contrary to the Anti-Corruption and Anti-Bribery Policy as specified in this document, such action constitutes misconduct that may result in disciplinary action against me, which may result in dismissal.

NAME: \_\_\_\_\_

STAFF NO.: \_\_\_\_\_ UNIT: \_\_\_\_\_

\_\_\_\_\_  
SIGNATURE:

DATE: \_\_\_\_\_