Anti-bribery policy

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1. Policy statement

CARE International UK (CIUK) is committed to the highest standards of integrity, accountability, and transparency. CIUK maintains a zero-tolerance policy towards bribery and corruption in any form, wherever we operate or our funds are used. Bribery undermines our mission, public trust, and the communities we serve.

This policy ensures full compliance with the UK Bribery Act 2010 and all other applicable anti-bribery and anti-corruption laws and regulations.

2. Scope

This policy applies to:

- All CIUK trustees, employees, volunteers, and representatives
- All partners, sub-grantees, contractors, consultants, and suppliers involved in CIUK-funded activities, wherever located
- All country offices and federation members implementing projects, humanitarian responses, development programmes, or other activities with CIUK funds

Every individual and entity working with or on behalf of CIUK must comply with this policy.

3. Related codes and policies

- CIUK Code of Conduct
- CIUK Fraud and Corruption Policy
- CIUK Conflict of Interest Policy
- CIUK Whistleblowing Policy
- CIUK Procurement Policy
- CI Code and its policies on anti-bribery

4. Definitions

Bribery
The offering, promising, giving, requesting, or accepting of any financial or other advantage to induce or reward improper performance of a function or activity related to CIUK's work. Bribery may involve cash, gifts, hospitality, travel, services, loans, employment opportunities, or anything else of value. It can be direct or indirect (through third parties).

Facilitation payments
Small, unofficial payments made to public officials to speed up or secure the performance of a

routine action (for example, to clear goods through customs or obtain permits). Such payments are prohibited except where someone's safety is at immediate risk, in which case the payment must be reported immediately.

Kickbacks
Payments or benefits given in return for awarding contracts or business, often as a percentage of the contract value. These are strictly prohibited.

Conflict of interest
A situation where an individual's personal, financial, or other interests could improperly influence their official duties or decisions made on behalf of CIUK.

Gifts and hospitality
Anything of value given or received as a mark of courtesy or appreciation. Modest, reasonable gifts and hospitality are generally acceptable if not intended to influence a decision, but those over £100 must be declared.

Associated persons
Any individual or organisation acting for or on behalf of CIUK, including staff, trustees, volunteers, partners, agents, contractors, suppliers, and consultants.

Public official
Any person holding a legislative, administrative, or judicial position (including employees of government departments, agencies, or state-owned enterprises), or anyone acting in an official capacity for a public body.

Improper performance
Failing to act in good faith, impartially, or in accordance with a position of trust, or performing a function in a way that breaches expectations of honesty and integrity.

5. Key principles and legal compliance

Bribery is strictly prohibited at CIUK. CIUK is committed to conducting all of its activities ethically, transparently, and in full compliance with the UK Bribery Act 2010 and all other relevant anti-bribery and anti-corruption laws, regardless of location or local practice.

Everyone acting for or on behalf of CIUK—including trustees, staff, partners, suppliers, and contractors—must comply with both the letter and spirit of these laws and uphold CIUK's standards of integrity at all times. All activities and decisions must reflect the organisation's values and commitment to honest, fair, and lawful conduct.

CIUK maintains, monitors, and reviews procedures designed to prevent bribery and to ensure effective compliance, including regular training, risk assessments, and internal controls.

6. Prohibited conduct

The following are strictly forbidden by CIUK's Anti-Bribery Policy:

- **Offering, giving, requesting, or accepting bribes:** Any act of offering, promising, giving, soliciting, or receiving any form of bribe, whether financial or non-financial, direct or indirect.
- **Facilitation payments:** Making or accepting small, unofficial payments to public officials or others to secure or expedite routine actions, except where refusal would put someone's life, liberty, or health at immediate risk. Any such payment must be reported as soon as possible.
- **Kickbacks and secret commissions:** Agreeing to, making, or accepting payments or benefits as a reward for awarding business, contracts, or favourable treatment.
- **Gifts and hospitality intended to influence:** Offering or accepting gifts, hospitality, or entertainment with the intention of influencing a decision, creating a sense of obligation, or gaining unfair advantage. Any gift or hospitality over £100 must be declared to line manager and approved.
- **Improper influence:** Attempting to improperly influence any procurement, contracting, grant-making, recruitment, regulatory, or programme-related decision.
- **Falsifying records or concealing payments:** Altering, concealing, or destroying financial or other records to hide or disguise bribery or related misconduct.
- **Using intermediaries to circumvent this policy:** Engaging third parties (agents, consultants, suppliers, partners, or others) to carry out bribery or corrupt acts on behalf of CIUK or in connection with CIUK-funded activities.

7. Responsibilities

- **Board of Trustees and Senior Leadership Team:** Responsible for setting a clear tone of integrity and ethical leadership, ensuring the policy is effectively implemented and resourced, regularly reviewing bribery risks and controls, and fostering a culture of transparency and accountability.
- **All staff, volunteers, and representatives:** Must read, understand, and comply with this policy; complete anti-bribery training; report any suspected or actual bribery or related misconduct promptly; declare any conflicts of interest; and seek guidance from the Risk and Internal Audit Manager when in doubt.
- **Partners, sub-grantees, contractors, and suppliers:** Required to comply with this policy for all CIUK-funded work; ensure all staff and subcontractors understand and comply; and flow down anti-bribery obligations in their own agreements.
- **Country offices and lead members implementing CIUK-funded activities:** Must ensure all CIUK-funded activities comply with this policy; provide assurance and evidence of compliance when required; and report any suspected or actual breaches to CIUK without delay.

8. Prevention and controls

To reduce the risk of bribery and maintain effective compliance, CIUK implements the following preventive measures and internal controls:

- **Bribery and corruption risk assessments:** Conducted at organisational, programme, and project levels, with particular attention to high-risk activities, locations, or transactions.
- **Due diligence:** Comprehensive checks on new partners, suppliers, contractors, and significant donors to assess their integrity, reputation, ownership, and anti-bribery controls.
- **Segregation of duties and approval processes:** Clear division of roles and responsibilities to prevent single points of failure or unchecked authority in procurement, contracting, payments, and other sensitive activities.
- **Conflict of interest management:** Ongoing declaration and management of real or perceived conflicts of interest, with mandatory recusal from related decisions where necessary.
- **Gifts and hospitality oversight:** Any gift or hospitality over £100 must be declared to the Director of Finance, Compliance and Governance. Staff must exercise judgement and seek guidance if uncertain.
- **Transparent financial management:** Accurate and complete recording of all transactions; prohibition of off-book accounts; regular financial reviews, audits, and spot checks, especially for high-risk activities.
- **Mandatory anti-bribery training:** All staff and relevant partners must complete training at induction and at regular intervals, with additional training for those in higher-risk roles or contexts.
- **Support and advice:** The Director of Finance, Compliance and Governance, Risk and Internal Audit Manager and compliance focal points are available to provide advice or clarification on any aspect of this policy.

9. Working with partners

- **Anti-bribery clauses in agreements:** All contracts and partnership agreements must include clear anti-bribery commitments and require compliance with this policy.
- **Flow-down requirements:** Partners and country offices must ensure these anti-bribery standards are passed down to all subcontractors and third parties engaged for CIUK-funded work.
- **Support:** CIUK will provide training and guidance to partners as appropriate and expects partners to proactively raise and address any risks or issues.

- **Consequences of breaches:** Any breach of this policy by a partner, supplier, or country office may result in immediate termination of agreements, recovery of funds, and reporting to donors or authorities as required.

10. Reporting and investigation

- **Obligation to report:** All staff, volunteers, partners, and representatives must immediately report any suspicion, allegation, or evidence of bribery, attempted bribery, or related misconduct. Reports can be made through CIUK's internal channels, the Whistleblowing Policy, or directly to the Director of Finance, Compliance and Governance fassil@careinternational.org, or compliance focal point.
- **Lead federation members or country offices implementing CIUK-funded activities** must engage CIUK immediately on any suspected or identified breach of this policy.
- **Confidentiality and protection:** Reports are treated with confidentiality, and those making reports in good faith will not face retaliation or adverse consequences.
- **Prompt and impartial investigation:** All concerns will be investigated promptly, impartially, and thoroughly. Substantiated cases will result in disciplinary action (up to and including dismissal), contract termination, and recovery of misused funds. Where required, CIUK will inform donors, the Charity Commission and authorities.

11. Training and review

- **Mandatory anti-bribery training:** All staff and relevant partners must complete anti-bribery training on induction and at regular intervals, with additional training as needed for higher-risk contexts or roles.
- **Continuous monitoring:** The Risk and Internal Audit Manager is responsible for monitoring the implementation and effectiveness of this policy, including training completion, incident reporting, and regular review of controls.
- **Regular policy review:** This policy will be reviewed at least every three years, or sooner if required by law, donor requirements, significant incidents, or identified gaps.
- **Feedback and improvement:** All staff and partners are encouraged to provide feedback or suggestions for improvement, which will be considered in policy updates and control enhancements.

12. No exceptions

There are no exceptions to this policy. Bribery or any attempt to justify, conceal, or ignore bribery is a serious breach of CIUK's standards and will result in disciplinary action, legal action, and reporting to donors or authorities as required.