



## ORGANIZATIONAL POLICY

### IRC ANTI-BRIBERY POLICY

Policy Owner: Office of General Counsel

Origination Date: March 2012\*

Revision Date: September 2018

Approved by: President

*\*This policy is based on, and supersedes, the related section of the March 2012 Transactional Compliance Policy*

#### **PURPOSE:**

As a U.S.-based organization operating in countries throughout the world, IRC is subject to certain anti-bribery laws, rules and regulations - related to its international business activities and transactions, including, but not limited to, the U.S. Foreign Corrupt Practices Act of 1977, as amended (the "FCPA"), and the U.K. Bribery Act t.

**POLICY:**

The IRC prohibits the making, offering, promising, or authorizing of a payment or Anything of Value<sup>1</sup>, directly or indirectly, to any persons, including Public Officials<sup>2</sup>, for the purpose of influencing any act or decision of a Public Official, or to secure an unfair business advantage or to obtain or retain business.

**Bribery**

IRC is committed to complying with all Anti-Bribery Laws. Anyone acting for or on behalf of the IRC is prohibited from receiving corrupt payments and directly or indirectly making, offering, authorizing, or promising a payment or Anything of Value to any persons, including Public Officials, for the purpose of influencing any act or decision of a Public Official, or to any third person while knowing or being aware of a probability that the payment or thing of value will be passed to a Public Official; or to secure any improper business advantage in order to obtain or retain business.

Examples of prohibited activities include, but are not limited to:

bribing a Public Official to obtain or renew registrations, permits, or certifications or to circumvent a licensing or permit requirement; corruptly paying excessive travel expenses for a Public Official;

paying or receiving a kickback, in which a portion of the revenue from a sale, a contract or some other amount is secretly returned to the person, or his or her designee, who influenced the award of such sale, contract or other benefit;

making such improper payments through intermediaries; and improper acceptance of payments from a vendor for the purpose of securing IRC business for that vendor; and

Commercial corruption: improper payments made or received in a commercial, non-governmental context.

IRC staff are prohibited from corruptly receiving anything of value from a public or private individual or entity.

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<sup>1</sup> cash and cash equivalents (e.g., checks, money orders, gift cards), gifts, entertainment, meals, travel, accommodations, education, and anything else of tangible or intangible value (e.g., a job offer, a loan or the use of equipment) no matter how small or de minimis, except for low value IRC-branded promotional materials (such as brochures, pens, or business cards).

<sup>2</sup> includes any public official, officer, employee or agent of a government or any department, agency, or instrumentality thereof, including any state-owned or controlled entity, including state-

There are circumstances where IRC must by written law pay for the services of Public Officials,

**REPORTING:**

A willful failure to report bribery or improper payments may be construed as aiding and abetting the wrongdoer. In addition to disciplinary action and/or termination of employment, violations of this Policy may result in civil liability for the wrongdoer and/or criminal prosecution. IRC Staff members are required to report violations of this Policy and suspicions of criminal activity in relation to any transactions or contact with other IRC Staff or third parties. Reports should be made in accordance with the IRC Global Reporting Guidelines.

IRC has adopted a zero-tolerance standard with respect to the conduct that violates this Policy. IRC will fully support any IRC Staff member who declines, in good faith, to engage in conduct that would place IRC s ethical principles and reputation at risk.

IRC prohibits retaliation against any IRC Staff who raises concerns in good faith, in accordance with IRC Anti-Retaliation and Reporter Protection Policy. Any instances of retaliation should be reported to the . The IRC takes allegations of retaliation seriously and will thoroughly investigate all claims. If retaliation occurred, appropriate disciplinary action will be taken against the retaliating party, up to and including termination.

**REVIEW:**

This Policy will be reviewed periodically by the Office of General Counsel with any recommendations for revisions to be presented to the Policy Review Committee and the President for approval.

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