

WORLD VISION UK POLICY STATEMENT ON BRIBERY

I. INTRODUCTION

World Vision UK's Code of Conduct Policy states that:

- I. World Vision is committed to conduct, as an organisation and by its personnel, that is ethical, legal and consistent with its values and mission;
- 2. World Vision opposes and does not act as a willing party to wrongdoing, corruption, bribery or other financial impropriety, or illegal acts in any of its activities;
- 3. World Vision takes prompt and firm corrective action whenever and wherever wrongdoing of any kind is found among its personnel;
- 4. World Vision personnel are expected to conduct themselves in a manner that reflects honesty and integrity, and that maintains the effectiveness, values and mission of the organisation;
- 5. These standards of conduct are maintained despite possible prevailing contrary practices elsewhere.

2. POLICY STATEMENT

The Board of Trustees and Executive Leadership Team of World Vision UK are committed to fostering an organisational culture in which bribery is never acceptable.

In accordance with the Bribery Act 2010, World Vision UK understands bribery to mean:

- offering, promising, giving, accepting or soliciting a financial or other advantage as an inducement to
 do something that is illegal or a breach of trust in the carrying out of an organisation's activities;
- inducing a person to perform improperly a relevant function or activity; or
- rewarding a person for the improper performance of such a function or activity.

World Vision UK will implement Anti-Bribery Procedures, which will include:

- I. Ensuring that all employees, volunteers and associated third parties understand the organisation's definition of bribery and the meaning of its 'zero tolerance' stance towards bribery and corruption within their day to day activities.
- 2. Identifying high risk areas for the organisation with relation to bribery and ensuring appropriate mitigation is in place.
- 3. Undertaking appropriate due diligence in respect of third parties associated with or performing services on behalf of the organisation.
- 4. Monitoring and reviewing such procedures at the most senior levels of the organisation within the reporting framework of the organisation's Risk Management Guidelines.
- 5. Co-operating fully with World Vision International in their implementation of Anti-Bribery Policies and Procedures in World Vision's Regional and National Offices.
- 6. Providing appropriate protection for 'whistleblowers' and thoroughly investigating any allegations of bribery in accordance with World Vision UK's Whistleblowing Policy;
- 7. Addressing instances of bribery or corruption of any kind whenever or wherever they occur in association with World Vision UK, in accordance with the organisation's Code of Conduct Policy, Disciplinary Policy or relevant contractual clauses with associated third parties.

3. SCOPE

This Policy Statement applies to all World Vision UK personnel, that is, all employees, Trustees, temporary staff and volunteers, and to consultants, contractors, agents or any other person or body associated with World Vision UK and performing services on behalf of World Vision UK.