

**FIGO BRIBERY POLICY**

***What is Bribery?***

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- The basic definition is that a person is guilty of an offence where he/she offers a financial or other advantage to another person for the improper performance of a function or activity.
- An organisation like FIGO is additionally taken to assume corporate responsibility for the actions of those with whom it is associated. This secondary offence applies if a person associated with FIGO bribes another person intending to obtain or retain business for FIGO or obtain or retain an advantage for FIGO.

**NOTE:**

- Advantage in this context is not necessarily financial
- A person associated with FIGO is someone who performs services on behalf of FIGO. This can be an employee, an agent or a representative.
- It will be a defence for FIGO to prove that FIGO has in place adequate procedures to prevent persons associated with FIGO from undertaking illegal conduct.

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**FIGO BRIBERY POLICY**

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- FIGO has zero tolerance of bribery
- FIGO will take any steps open to it to ensure that neither FIGO nor any person or organisation associated with FIGO indulges in unlawful conduct or is exposed to it.
- Bribery is where a person offers a financial or other advantage to another person for the improper performance of a function or activity.
- FIGO has a policy on receiving and offering gifts, hospitality and expenses.
- FIGO has a policy on political and charitable donations.
- FIGO monitors and enforces its policies.
- FIGO carries out a risk assessment in respect of all major supply contracts and in respect of potential recipients of grants in accordance with its Risk Policy.
- FIGO actively encourages those with whom it is associated to inform FIGO by direct communication of any breach or potential breach of this policy. Direct communication is to its Chief Executive, Professor Hamid Rushwan at Hamidrushwan@figo.org or by post to FIGO House - Suite 3 - Waterloo Court 10 Theed Street, London, SE1 8ST marked "Strictly Private & Confidential to be opened by Professor Rushwan only".

**FIGO BRIBERY POLICY**

***Obligations of Officers***

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1. Know what bribery is. Know how FIGO can be responsible for bribery committed by a person associated with FIGO
2. Adopt zero tolerance to bribery.
3. Ensure that the policy is brought to the attention of all staff, consultants, contractors and suppliers and that as a matter of procedure all persons and organisations becoming associated with FIGO for the first time are made aware of the policy before a contractual relationship is formed.
4. Actively promote the policy.
5. Review the policy in the light of events as often as is necessary and not less frequently than 12 monthly.
6. Issue additional guidance to all staff, consultants, contractors, and/or suppliers from time to time as required.
7. Publish a gifts hospitality and expenses policy and monitor observance by all stakeholders.
8. Publish a political and charitable donations policy and monitor observance by all stakeholders.
9. Carry out a risk assessment in respect of bribery and review the assessment in the light of experience from time to time and in any event not less frequently than 12 monthly.

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**FIGO BRIBERY POLICY**

***Procedure for Investigation of Incidents***

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1. In the first instance the investigation will be carried out by the Chief Executive in person.
2. The Chief Executive will in all appropriate cases immediately appraise the President of FIGO of the matter under investigation.
3. The Chief Executive shall prepare a preliminary report, if possible, within five working days of becoming aware of the matter in question which shall be submitted to the President/Officers.

4. The Chief Executive shall in carrying out his preliminary investigation make recommendations to the President/Officers as to whether the assistance of an outside agency should be sought and, if so, the agency or agencies in question.
5. The Chief Executive shall complete his report with all due dispatch and shall submit same to the President/Officers.

***FIGO RISK of BRIBERY POLICY***

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1. FIGO believes it important in monitoring implementation of its Bribery Policy that it carries out an appropriate and proportionate risk analysis in respect of those with whom it comes into contact.
2. The Policy covers all major supply contracts, grant making organisations of a similar kind and recipients or prospective recipients of major grants from FIGO.
3. A major supply contract will be with an organisation which supplies services and/or goods to a value of £10,000 or more in any 12 month period.
4. A grant making organisation of a significant kind will be one who has granted or been asked to grant FIGO £100,000 or more in a 12 month period. A recipient or prospective recipient of a major grant from FIGO will be one where the amount of the grant is £50,000 in any 12 month period.
5. The analysis of or assessment of risk should weigh the following factors:-
  - **Geographical:** It is possible that certain areas of the world pose a greater risk of bribery than others.
  - **Cultural:** It might be thought that in certain cultures bribes can be seen as part of every day life.
  - **Emergency situations:** In an emergency it may be that there is an increased risk of exposure to risk of bribery because there is limited time in which to make an assessment.
  - **Associates:** Associations with large pharmaceutical companies and with foreign governments may be thought to be a greater risk than smaller commercial organisations and those of a non-governmental nature.
  - **Partnership:** With whom is FIGO in partnership? What does FIGO know of the partner? Should enquiries be made?