



ANTI-BRIBERY POLICY

Policy:

It is the policy of International Medical Corps to conduct all of our business in an honest and ethical manner. We do not tolerate bribery or any other form of corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery. The purpose of this policy is to provide guidance and assistance in recognizing and reporting bribery. All personnel are required to report any instance of bribery or suspected bribery.

Comment:

(1) A bribe is a gift, payment, or offer or promise to pay or give something of value—including non-financial benefits—by a staff member or by an agent hired by International Medical Corps, to

- a government official or representative
- an employee or agent of public international organizations such as UN agencies and the World Bank
- third party agents who engage with government officials on behalf of International Medical Corps

for the purpose of

- influencing an official act or decision
- influencing violation of a lawful duty, or
- securing some advantage, such as obtaining a contract, permission to do business, preferential tax or customs treatment.

(2) Something of value can include any sort of benefit, whether financial or otherwise. Examples include:

- Cash, gift cards, vouchers, coupons
- Travel
- Job offers

- (3) It does not matter if something is offered or given from personal or International Medical Corps resources.
- (4) Bribes may not be offered or given through an intermediary, such as an agent, representative or any other person.

Gifts and Hospitality:

This policy does not prohibit giving and receiving non-cash gifts of low (nominal) value or customary and appropriate hospitality of nominal value. However, in certain circumstances gifts and hospitality may amount to bribery. Providing or accepting gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his or her duties is prohibited.

Reporting Responsibilities:

- (1) All staff are required to report any instance of bribery or suspected bribery and all requests to pay bribes.
- (2) The person who discovers a case of bribery or suspected bribery should report the discovery to their immediate supervisor.
- (3) If reporting to the manager or supervisor is not possible and/or the person reporting wishes to remain anonymous, the **International Medical Corps Reporting Hotline** is a comprehensive reporting system in which staff can file secure, anonymous reports via phone or Internet. This system is hosted and managed by EthicsPoint—a leading industry provider of confidential reporting systems. Hotline specialists can be reached 24 hours per day, 7 days per week to assist with reporting, as well as to provide guidance on whether a situation may be a cause for concern.

How to submit a confidential report anytime from anywhere:

- Via phone: Call your respective country hotline at the number listed at www.internationalmedicalcorps.ethicspoint.com.
- Via Internet: Go to www.internationalmedicalcorps.ethicspoint.com > “File a new report”

If access to the above EthicsPoint portal or telephone number is not possible, please contact report@InternationalMedicalCorps.org for further instruction, or contact Petar Ivankovic, Compliance Auditor, at +385 21 455 281 or PIvankovic@InternationalMedicalCorps.org with any questions.

- (4) All information received will be reviewed so that an appropriate investigation may, if warranted, be conducted.

- (5) All staff have an obligation to cooperate fully in the investigation process. Failure to cooperate will result in disciplinary action, up to and including termination.
- (6) **SAFEGUARDS**
- (a) **No Adverse Action**
No adverse employment action, such as termination or counseling, will be taken against any staff member in retaliation for reporting allegations which the staff member reasonably believes to be true.
 - (b) **Harassment**
Harassment of any staff member who has reported a concern in good faith will not be tolerated. If harassment is found to have occurred, appropriate disciplinary action, up to and including termination, will be taken against the harasser.
 - (c) **Confidentiality**
International Medical Corps will maintain confidentiality in the investigation of any allegation. Investigations and the results of investigations will be discussed only with those who are on a need-to-know basis.
 - (d) **Anonymous Allegations**
Staff are encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.
 - (e) **Malicious Allegations**
Individuals making allegations with reckless disregard for their truth or falsity may be subject to disciplinary action, up to and including termination, by International Medical Corps.
- (7) Violation of this policy will result in disciplinary action up to and including termination and may constitute a violation of applicable law.