

## Business Ethics and Anti-Bribery Policy

### 1. Introduction

It is the policy of Fuel Macedonia to conduct our activities in an honest and ethical manner. A zero-tolerance approach is applied to bribery and corruption at every level in the organisation. This policy provides guidance in accordance with the Bribery Act 2010 but if there are concerns about any business or other dealing, irrespective of the Act, it should be reported immediately to the Chair of Trustees.

This policy applies to all individuals associated with Fuel Macedonia, including trustees, supporters and volunteers. It also applies to third parties (any individual or organisation) you come into contact while representing Fuel Macedonia, including actual and potential local partners, partner organisations and beneficiaries; donors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

This policy will be reviewed regularly and any improvements identified will be made as soon as possible.

### 2. Policy

A bribe is an inducement or reward offered in order to gain any commercial, contractual, regulatory or personal advantage. In general, other than in the normal course of our day to day operations where expenses, such as refreshments during a meeting and so forth, are usual, the Charity actively discourages any level of other gift or broader hospitality. However, the aim of this policy is not to prohibit normal and appropriate hospitality being given to, or received from, third parties.

Gifts or hospitality must not, however, be given or received with the intention of influencing the Charity, or a third party, to provide a business or personal advantage. If in doubt, discuss the issue with the Chair.

You should ensure the hospitality or any gift you receive:

- complies with local law
- is given in the name of Fuel Macedonia, not in your name
- does not include cash or a cash equivalent (such as gift certificates or vouchers)
- is appropriate. For example, it is customary for small gifts to be given at Christmas
- considering the reason for the gift, it is appropriate in terms of type, value and timing
- is given openly, not secretly *and*
- is not accepted from government officials or representatives, or politicians or political parties, without the prior approval of the Chair.

If by any chance a gift is received, it is custom and practice to share this with the rest of the trustees, supporters or volunteers present at the time (for example, a box of chocolates from a grateful beneficiary) or, if it is not suitable for sharing, to raffle this with the money raised coming to Fuel Macedonia.

It is **not** acceptable for you (or someone on your behalf):

- to give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that an advantage will be received, or to reward an advantage already given
- accept payment from a third party that you know, or suspect, is offered with the expectation that it will obtain a business advantage for them or an advantage will be provided by Fuel Macedonia in return
- accept a gift or hospitality from a third party if you know, or suspect, that it is offered or provided with an expectation of a business advantage
- threaten or retaliate against another member of staff or volunteer who has refused to commit a bribery offence or who has raised concerns under this policy or engage in any activity that might lead to a breach of this policy.

### **3. Your responsibilities**

You must ensure that you read, understand and comply with this policy. The policy is communicated to all new volunteers as part of their induction process and is communicated to existing trustees and volunteers. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those volunteering with, or for, Fuel Macedonia.

You must notify the Chair of Trustees as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

Fuel Macedonia is required to keep financial records which will evidence the business reason for making any payments to third parties. You must therefore declare and keep a written record of all hospitality or gifts accepted or offered and ensure that all expenses claims are submitted in accordance with the expenses policy and specifically record the reason for the expenditure and that it was incurred in the proper course of the activity of Fuel Macedonia.

For the sake of clarity, it is Fuel Macedonia's policy that no gifts of cash or cash equivalent (such as gift certificates or vouchers) should be accepted by volunteers from third parties. Any such gifts received are deemed to be a donation to Fuel Macedonia and will be treated as such, duly recorded as appropriate.

Any trustee or volunteer who breaches this policy may face disciplinary action.

### **4. Red flags**

In the sector in which Fuel Macedonia operates, the following circumstances are considered to be the areas where risks are most likely and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

- You become aware that a third party/beneficiary engages in, or has been accused of engaging in, improper business practices
- A third party/beneficiary requests payment in cash and/or refuses to sign a receipt, or fails to provide an invoice or receipt for a payment made
- A third party/beneficiary offers (or indeed demands) entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- You receive an invoice from a third party that appears to be non-standard or customised

- You are offered an unusually generous gift or offered undue hospitality by a third party/beneficiary.

#### **5. Raising concerns**

You are encouraged to raise concerns with the Chair of Trustees at the earliest possible stage about any issue or suspicion of malpractice or if you are offered a bribe by a third party/beneficiary, are asked to make one, or suspect that this may happen in the future. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with the Chair of Trustees.

Fuel Macedonia encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Fuel Macedonia is committed to ensuring no one suffers any detriment or unfavourable treatment as a result of refusing to take part in bribery or corruption, or because they report something in good faith. If you believe you have received any such treatment, you should raise the issue with the Chair of Trustees.