ANTI-BRIBERY POLICY

<Organization Name> (the “Company”) is committed to ethical and honest business practices. <Organization Name> has therefore put measures in place to protect our business, our reputation, and our employees from threats of bribery. As such, <Organization Name> has a zero-tolerance approach to any corruption, fraud, or bribery in the workplace.

Note: This policy is to be used in combination with our Code of Conduct Policy.

DEFINITIONS

A **bribe** can be defined as a payment or incentive in the form of a gift, reward, or other monetary advantage – as an inducement to do something dishonest or illegal, and often constitutes a breach of trust in the course of business. Bribery typically goes hand-in-hand with corruption, which is the abuse of entrusted power for private gain.

POLICY

Bribery is illegal under the Criminal Code of Canada.

<Organization Name> will not tolerate bribery whether by an employee, a client, or any other third party.

Employees of <Organization Name> may neither offer a bribe or accept a bribe while working at our Company. Employees at all levels must keep accurate records and logs about expenses, payments, income, etc.

Responsibilities

The Employer will:

* Ensure employees have been informed about this policy and the dangers to themselves and the Company for taking part in bribery
* Ensure employees know the red flags to be on the lookout for when it comes to bribery such as transactions being done in secret, practices that are knowingly against the law, benefits or advantages being offered, favours being requested, and so on
* Complete risk assessments on an ongoing basis to examine bribery situations employees may exposed to, and implement solutions to mitigate these dangers
* Put in place a reporting system so that employees feel comfortable bringing concerns forward to management, including what to do if a senior member of the team is involved in bribery

Employees are responsible for:

* Following the rules laid out in this policy and all legislation as related to bribery
* Familiarizing themselves with the laws and regulations within the areas they are doing business
* Looking for warning signs of bribery
* Directly report any act of bribery that is detected or suspected to the immediate supervisor. If that person is believed to be involved, the report should be made to the supervisors/employees next level of supervision that is not suspected to be involved.
* Complying and cooperating with any investigations surrounding bribery practices

Reporting and Investigating

If an employee has any concerns about bribery occurring in the workplace, they must report this to a supervisor immediately. Employees who have concerns about the conduct or actions of other employees or supervisors are also responsible for reporting these instances.

If you are afraid to report an issue of bribery or perceived bribery, you may do so anonymously by [Insert how employees can report anonymously].

<Organization Name> will investigate any reports of bribery, whether they are reported anonymously or not. <Organization Name> will involve the appropriate law enforcement authorities where applicable.

Employees who report a legitimate concern about bribery will not be retaliated against.

Breach of Policy

Employees who are in breach of this policy may face disciplinary action that may include termination of employment. Law enforcement may be notified if the situation calls for it.