Anti-bribery and Anti-corruption Policy

The Worldreader Anti-Bribery & Anti-Corruption Policy was developed by a working group established with the aim to be committed to complying with local and international laws and regulations; to better describe procedures for alert raising and handling of corruption and bribery; and, to include risk management into the policy. It is part of a broad range of Worldreader policies and procedures that are designed, as a whole, to ensure that we are responsible stewards of voluntarily-contributed money and of the funds we hold in trust in our accounts.

This policy outlines Worldreader's zero-tolerance stance against all forms of bribery and corruption.

The policy will be revised every three years or sooner if circumstances warrant. The next revision is foreseen in Mar 2023. We hope that the Anti-Bribery & Anti-Corruption Policy will be a useful tool in our effort to combat corruption!

Worldreader Team, April 2021
Anti-bribery and Anti-corruption Policy

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1. Introduction

1.1 Purpose

This Policy sets out Worldreader’s strict prohibition on bribery or any other improper payments in any of its operations. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Worldreader to possible criminal prosecution, reputational harm or other serious consequences.

1.2 Scope

This prohibition applies to all business activities anywhere in the world, whether they involve government officials or are wholly in the private sector.

This Policy applies to everyone at Worldreader, including all officers, employees and agents or other intermediaries acting on Worldreader’s behalf.

1.3. Zero-tolerance

Applying the principle of zero-tolerance, Worldreader will act in response to cases of bribery or corruption, keeping in mind its broader development objectives and the context of the societies in which Worldreader operates. All detected incidents or suspicions of incidents will be reacted upon, and the action taken will be in accordance with this Policy and regulations, local legislation, and the context and nature of the incident.

As a complement to its zero-tolerance policy to bribery and corruption, Worldreader will not accept any other type of corruption-like behaviors, that may arise from conflicting personal interests or illegal activities such as intentional deception made for personal gain.

1.4 Risk Assessment and Proportional Response

Worldreader will conduct internal and external risk assessments of the probability and potential impact of acts of bribery and corruption. Factors such as geographical, cultural, sectoral, and transactional risks will be assessed among others concerning bribery and corruption. As Worldreader has a zero-tolerance policy towards bribery and corruption, it will take proportional measures in addressing such acts. Worldreader will put efforts towards preventing bribery and corruption through disseminating its policy, providing training to employees, and procedures of mitigation and reporting.
2. Policy Statement

**Corruption** is defined as the abuse of entrusted power for private gain. Common forms of corruption include bribery, extortion, fraud, or embezzlement, but also any kind of favoritism and nepotism are manifestations of corruption. To fight corruption, we embrace transparency. Seeking and receiving information can help safeguard against corruption and increase trust in decision-makers and non-governmental organizations. However, transparency is not only about making information available but also ensuring it can be easily accessed and understood.

**Bribery** is the offering, giving, promising, accepting, soliciting, including the authorization of another, an improper benefit, directly or indirectly, with the intention to induce or influence another to obtain a business or personal advantage.

Improper payments include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage.

A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and Worldreader to possible criminal prosecution, reputational harm or other serious consequences.

Third parties engaged by Worldreader are subject to risk-based due diligence in accordance with Worldreader's Third Party Due Diligence Policy.

Donations to Worldreader will shortly be subject to risk-based due diligence in accordance with Worldreader's forthcoming Anti-Money Laundering Policy and Acceptable Gifts Policy.

3. Acceptability

3.1 Gifts and Hospitality

3.1.1 Receiving gifts and hospitality personally

All Worldreader employees are encouraged to participate in community and professional activities. When an employee’s activities are part of their regular duties and responsibilities, payment must be turned over to Worldreader.

When an employee does work that is prior to or separate from their regular duties and responsibilities at Worldreader in which the activity is in any field
directly related to Worldreader, to avoid any conflict of interest, the employee must have prior approval by the CIO and the Director of Development should be notified by email. No employee can formally represent himself/herself as a spokesperson for Worldreader without prior approval from his/her supervisor.

All revenues derived from Worldreader activities while employed by Worldreader must be turned over to Worldreader.

See Conflict of Interest Policy.

3.1.2 Receiving gifts and donations for Worldreader

If local law permits donations, any donations received must be deposited following Worldreader’s Payment Instructions For Donors. These monies are included in the total bank balance and are factored into the monthly cash projections. The Accounting and Administration Director and Director of Development must be notified by email of any donations received. The email must include the amount of donation, the donor and a description of how the donor wants the monies to be spent, if the donor has specified. Worldreader will issue a receipt and retain a copy of the receipt for each donation received.

See Accounting Policy.

3.2 Procurement, Facilitation Payments and Kickbacks

All procurement shall be conducted free of bribery and corruption.

A facilitating or expediting payment is a payment to a foreign official, political party, or party official for the purpose of expediting or securing the performance of a routine governmental action by a foreign official, political party, or party official.

Worldreader does not accept and will not make any form of facilitation payments.

Kickbacks are made in exchange for a business favor or advantage. Worldreader does not allow kickbacks to be made or accepted.

3.3 Charitable Contributions

Worldreader accepts and encourages the act of donating to charities through services, knowledge, time, or direct financial contributions.
All charitable contributions by Worldreader made must be disclosed as they are made and made with the approval of the Compliance Officer.

All charitable contributions must be legal and ethical under the local laws and practices. Employees must ensure that any charitable contributions made are not used to facilitate and/or conceal acts of bribery.

3.4 Political Contributions

Worldreader will not make donations, in cash, kind, or any other means, to support any political parties or candidates. Political contributions may be perceived as an attempt to gain improper business advantage.

4. Employee Responsibilities

All employees including paid and non-paid staff, volunteers, interns, consultants, and others employed by Worldreader must read, understand, comply with and implement this Anti-Bribery & Anti-Corruption Policy.

Employees and agents engaged by Worldreader are responsible for the prevention, detection, and reporting of bribery and any other form of corruption. Employees must also avoid any activities that could imply, lead to, or fail to comply with this Policy.

Employees must notify the Compliance Officer if they have reason to believe or suspect that bribery or corruption, or any action contrary to this Policy has occurred or will occur.

Any employee who fails to comply with this Policy will face disciplinary action from Worldreader, which may result in suspension or dismissal in the event of gross misconduct. Those involved in fraud or corruption may be reported to external authorities for criminal prosecution. Worldreader reserves the right to terminate any contractual relationship with agents acting on behalf of or under Worldreader’s direction for failing to comply with this Policy.

5. How to raise a concern

5.1 Raising a Concern

As soon as an employee suspects an instance of bribery or corruption in relation to Worldreader, they must raise their concerns at the earliest stage.
If an employee is uncertain about whether an instance, action or behavior constitutes bribery or corruption they should immediately speak with their supervisor or Compliance Officer in accordance with Worldreader’s Whistleblowing Policy.

5.2 Victim of Bribery or Corruption

Employees who are offered or asked to make a bribe, suspect that they may be bribed or asked to bribe in the near future, or have reason to believe that they are a victim of other corrupt activities, must inform their supervisor or the Compliance Officer as soon as possible.

5.3 Protection

Worldreader encourages openness and supports any individual who raises genuine concerns, in good faith, under this Policy, even if the investigation finds that they were mistaken. Worldreader will ensure employees can raise their concerns swiftly and confidentially and that no reprisals are taken against individuals raising good faith concerns.

See Whistleblowing Policy.

6. Training and Implementation

Worldreader will provide training on this Policy as part of the onboarding process for all new employees and for current employees.

Worldreader and its employees must clearly communicate at the outset of business relations with all contractors, suppliers, business partners, and other third-parties working with or on behalf of Worldreader this Anti Bribery and Anti Corruption Policy.

7. Record Keeping

Worldreader will keep detailed and accurate financial records and will have internal controls in place to evidence all payments made including the amount and reason for hospitality or gifts accepted and given. Gifts and acts of hospitality are subject to managerial review.

8. Monitoring and Reviewing
Worldreader's Executive Team has overall responsibility for ensuring that this Policy complies with all legal and ethical obligations and that those under their control comply with it.

Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

This Policy, internal control systems and procedures put in place and training on this Policy are subject to regular review and may be amended at any time to ensure they remain effective and up to date in practice and/or to improve their effectiveness at preventing bribery and corruption.

Any concerns, suggestions, or feedback on this Policy should be addressed to the Compliance Officer.

9. Related policies

- Whistleblowing Policy
- Code of Conduct
- Third Party Due Diligence Policy
- Acceptable Gifts Policy (*forthcoming*)
- Anti-Money Laundering Policy (*forthcoming*)
- Conflict of Interest Policy
- Accounting Policy

10. Responsible Department

The **Compliance & Legal** Department is responsible for maintaining this policy and resolving any doubts regarding its interpretation.

Any questions or concerns that arise as to this Procedure should be directed to Worldreader's Compliance Officer: compliance@worldreader.org.