



## ANTI BRIBERY AND CORRUPTION POLICY

### INTRODUCTION

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1. GWT demands the highest standards of integrity and ethical conduct in its business dealings. GWT will not tolerate any bribery or corrupt practices related to its business activities from its employees or business partners. It is committed to transparent reporting and to taking all other reasonable measures which avoid GWT's involvement in bribery or corruption.

**It is illegal to offer, promise, give, request, agree, receive or accept bribes**

2. Bribery and corruption undermine the rule of law and the principle of fair competition. Such activities entrench bad governance, hindering efforts to alleviate poverty and often contributing to economic instability and human rights abuses. Whilst the risk of bribery exists in all countries, sectors and transactions, GWT staff can take practical steps to mitigate the inherent risk of corrupt behaviours. This Anti-Bribery and Anti-Corruption Policy (the "Policy") aims to inform GWT management, employees and business partners about our intention to closely monitor corruption risk and to take immediate action if evidence of corrupt activity is suspected.

### OBJECTIVE OF THE POLICY

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3. The objective of this Policy is to provide a procedure by which GWT conducts its business, ensuring honest and ethical business practices which reflect the highest standards of integrity and in compliance with all applicable laws and regulations.

### APPLICATION OF THE POLICY

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4. This Policy applies to all GWT employees, wherever they are located, as well as contract staff or business partners working on our behalf. GWT employees must never accept or give a bribe, facilitation payment, kickback or other improper payment under any circumstances. This includes transactions with government officials (whether from the Government of Nepal or any other government) as much as with any private company or person. It also applies where payment is received directly or where it is received through a third party (agent, contractor, representative, distributor, or business partner).

## MANAGEMENT RESPONSIBILITIES

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5. GWT's Senior Management Team takes responsibility for encouraging a transparent and ethical culture at GWT, both in the UK and Nepal. This role includes:
  - a. Regularly undertaking periodic and high-level risk assessments of its business activities;
  - b. Responsibility for ensuring that the Policy is well communicated to GWT employees, contractors, suppliers and business partners alike;
  - c. Encouraging trust and dialogue with employees, so that they can voice their concerns if they witness any dishonest activity; and
  - d. Leading by example and behaving with utmost integrity at all times.

## PROHIBITED BEHAVIOURS

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6. GWT prohibits the following behaviours from all employees:
  - a. Bribery of government officials or private sector counterparts, including facilitation payments;
  - b. Bribery of employees of non-government organisations;
  - c. Embezzlement of property;
  - d. Abuse of function;
  - e. Illicit enrichment i.e. personal financial gain from activities undertaken on behalf of GWT;
  - f. Laundering or concealment of proceeds of crime; and
  - g. Obstruction of justice.

## PREVENTION OF IMPROPER PAYMENTS

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7. GWT strictly prohibits the use of improper payments. This includes:
  - a. The improper or concealed use of 'kickbacks', subcontracts, purchase orders, consultancy agreements or payment of agents to secure business or profit; or
  - b. The direct or indirect offer, payment, soliciting or acceptance of bribes. For the avoidance of doubt this includes:
    - i. To directly or indirectly offer, give or agree to give or offer a loan, reward, advantage or benefit of any kind to a public official, political party, party official or political candidate as consideration for an act or omission by the recipient in connection with the performance of the recipient's duties or functions with the government. Examples include applications for import permits, customs procedures or judicial proceedings;
    - ii. To induce an official to use his or her position to influence any acts or decisions of government for the purposes of obtaining an advantage in the course of business; or to agree, or comply with any demands for a bribe made by a public official.

## **GIFTS AND HOSPITALITY**

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8. GWT recognises that reasonable and proportionate gifts and hospitality are a legitimate contribution to good relationships between GWT and its business partners. However, judgement must be used to ensure these are reasonable, ethical and proportionate. For instance:
  - a. The cost or expense of a gift, meal or entertainment must be reasonable, given in good faith and directly connected to legitimate GWT activity or the performance of existing contracts;
  - b. When considering what is a reasonable expense, GWT employees should consider the frequency with which such expenses are incurred for any given individual as well as the cost. As a general rule hospitality should not be significantly more generous than anything GWT would be likely to provide in return and where there are concerns or staff are unsure, guidance should be sought from line management;
  - c. GWT employees are forbidden from soliciting gifts or hospitality, and GWT employees must endeavour to avoid conflicts of interest and the appearance of conflicts of interest;
  - d. Some examples of gifts that are not acceptable include:
    - i. Any gift or entertainment that would be illegal (anything offered to a government official in breach of local or international bribery laws);
    - ii. Gifts or entertainment involving parties engaged in a tender or competitive bidding process;
    - iii. Any gift of cash or cash equivalent (such as gift certificates, loans, or stock options);
    - iv. Any gift or entertainment that is a 'quid pro quo' (offered for something in return); or
    - v. Any entertainment that is indecent, or sexually oriented.

## **SUPPLY CHAIN RISK MANAGEMENT**

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9. When selecting potential business partners, GWT will endeavour to work with those that are likeminded in their approach to maintaining high ethical standards as well as demonstrating legal and regulatory compliance. GWT will include risk management measures in its procurement practices, for example:
  - a. GWT's contractual terms will contain an ethical policy, including a statement on bribery and corruption.
  - b. Before entering into new contractual relationships, GWT will Undertake:
    - i. An internal corruption risk assessment; and
    - ii. A due diligence review of the business partner.
  - c. Once the business relationship is successfully approved, periodical review of the business relationships will be ongoing, although the level of oversight required will vary depending on the risks identified upon initial assessment.

## **TRAINING AND COMMUNICATION OF THE POLICY**

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10. A copy of this Policy has or will be made available to all Trustees, GWT employees (both in the UK and Nepal) as well as its auditors, legal counsel and other advisors. It is also posted on the GWT website. GWT will provide periodic compliance training on this Policy and good practices.

## REPORTING VIOLATIONS

11. Any GWT employee that becomes aware of actions which could constitute a violation of this Policy is to report it to their line manager as soon as possible. However, if the employee is not comfortable reporting the matter to their immediate supervisor, or does not feel their immediate supervisor has taken sufficient action, they are to report the matter to any one of the following individuals: Director GWT, Chief of Staff GWT, Director GWS or the Field Director GWS. No employee will suffer undue consequences for reporting suspected or actual violations in good faith.

## CONSEQUENCE OF NON-COMPLIANCE WITH POLICY

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12. Any employee who is found to be giving or taking bribes or partaking in any other corrupt acts will be subject to disciplinary action which may ultimately lead to dismissal. The violation of this Policy may also be a violation of certain national laws and, if appropriate, GWT may refer the matter to the appropriate regulatory authorities which could lead to criminal proceedings.
13. Should evidence of corrupt practices be uncovered, GWT will consider a full range of remedial measures including, but not limited to:
  - a. Voluntary restoration of damages or loss caused by the offence;
  - b. Recovery of ill-gotten gains (e.g. proceeds of the corrupt act);
  - c. Acceptance of an external compliance monitor; or
  - d. Corrective organisational actions (e.g. removal or other disciplinary measures against responsible employees).

## QUERIES

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14. Employees are encouraged to contact their line management and ultimately Chief of Staff GWT should they have any comments or queries about this Policy.