# ANTI-BRIBERY POLICY

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## Table of Contents

## Approval Statement

**Policy Title:** Anti-bribery Policy
**Policy Code:** PY50005004
**Approval Date:** December 10, 2024

**Statement of Approval:**
The Board of Directors of Peace by Youth (PY) formally approves the adoption and implementation of the Anti-Bribery Policy. This policy has been reviewed and endorsed as a critical framework to uphold PY's commitment to integrity, transparency, and ethical conduct in all its operations and relationships.

The Anti-Bribery Policy establishes a zero-tolerance stance against bribery and corruption. It provides clear definitions, principles, and procedures to prevent, detect, and address any acts of bribery or corruption within PY's activities. This policy reinforces PY's dedication to maintaining the trust of its stakeholders and ensuring compliance with legal and ethical standards as it advances its mission to empower youth, foster peace, and drive sustainable development.

**Implementation and Review:**
This policy will be communicated to all relevant stakeholders and rigorously enforced across PY's operations. It will be periodically reviewed and updated to align with evolving best practices, regulatory changes, and organizational priorities.

**Signatures:**
Chairperson, Board of Directors
Name: Nisar Ahmed

Signature: ____________________
Date: December 10, 2024.

Secretary, Board of Directors
Name: Hina Jamil

Signature: ____________________
Date: December 10, 2024.

# 1. INTRODUCTION

### 1.1 Purpose

Peace by Youth (PY) is firmly committed to maintaining the highest standards of ethical conduct and integrity in all its operations and activities. Our dedication to these principles is paramount, as we recognize that our reputation, the trust of our beneficiaries, and the integrity of our work depend on our unwavering commitment to ethical behavior. The purpose of this Anti-Bribery Policy is to underscore PY's zero-tolerance stance towards bribery and corruption in any form and to provide clear guidelines to all Employees and Partners to ensure adherence to this policy.

**Objectives of the Policy:**

1. **Prevent Bribery:** To implement robust measures that prevent bribery in all its forms across PY's operations and activities. This involves creating an environment where bribery is actively discouraged, and ethical behavior is the norm.
2. **Promote Ethical Conduct:** To foster a culture of honesty, transparency, and accountability within PY and among its affiliates, Employees, and Partners. This includes promoting ethical decision-making and behavior at all levels of the organization.
3. **Compliance with Laws:** To ensure that PY complies with all relevant anti-bribery and anti-corruption laws and regulations, both domestically and internationally. This includes adhering to the legal requirements of the countries in which we operate and following best practices in the field of anti-bribery and corruption.
4. **Protect PY's Reputation:** To safeguard PY's reputation and the trust placed in us by our beneficiaries, donors, and other stakeholders. This involves maintaining the highest standards of integrity in all our dealings and ensuring that our actions reflect our commitment to ethical conduct.
5. **Clear Guidelines and Procedures:** To provide clear and comprehensive guidelines and procedures for identifying, preventing, and addressing bribery and corruption. This includes defining what constitutes bribery, outlining the responsibilities of Employees and Partners, and specifying the actions to be taken in the event of a suspected or actual bribery incident.
6. **Encourage Reporting:** To encourage the prompt reporting of any suspected or actual instances of bribery or corruption. This includes ensuring that Employees and Partners feel confident and supported in reporting such incidents, without fear of retaliation.
7. **Ensure Accountability:** To ensure that all Employees and Partners understand their responsibilities under this policy and are held accountable for their actions. This includes implementing appropriate disciplinary measures for violations of the policy and recognizing and rewarding ethical behavior.

By implementing this policy, PY aims to create an organizational culture where bribery is not tolerated, ethical behavior is promoted, and all Employees and Partners are aware of their responsibilities and the consequences of non-compliance. This policy serves as a cornerstone of PY's commitment to integrity and ethical conduct, reinforcing our dedication to operating in a manner that is transparent, accountable, and aligned with our core values.

**1.2 Scope**

This Anti-Bribery Policy applies to all aspects of PY's operations and activities, ensuring a comprehensive approach to preventing and addressing bribery and corruption. The policy is designed to cover a wide range of individuals and entities associated with PY, thereby extending its reach and effectiveness.

**Scope of Application:**

1. **Peace by Youth (PY) and its Affiliate Organizations:**
    - This policy is binding on PY and all its affiliate organizations, collectively referred to as "PY." This includes all departments, divisions, and units within PY, regardless of their geographical location or functional role.
    - Affiliate organizations are defined as those entities that operate under the PY umbrella, either through direct control, significant influence, or partnership agreements. These entities are expected to adhere to the same high standards of ethical conduct and anti-bribery measures as PY.
2. **Members of the Board of Directors, Officers, Management, Employees, Interns, and Volunteers (Collectively "Employees"):**
    - This policy is applicable to all individuals serving on PY's Board of Directors, including both executive and non-executive members. Board members play a crucial role in setting the tone at the top and are expected to lead by example in promoting ethical behavior and adherence to this policy.
    - Officers and management personnel, including senior executives and department heads, are responsible for ensuring that their teams understand and comply with the policy. They are also accountable for implementing and monitoring anti-bribery measures within their areas of responsibility.
    - All employees, regardless of their position or role within PY, are required to comply with this policy. This includes full-time, part-time, and temporary employees, as well as interns and volunteers. Each employee is expected to understand the policy, participate in relevant training, and adhere to the guidelines and procedures outlined herein.
3. **Sub-grantees, Partner Organizations, Contractors, Outside Experts (Including Advocates), Consultants, Representatives, and Any Other Organization or Individual Acting on PY's Behalf or at PY's Direction (Collectively "Partners"):**
    - This policy extends to all external entities and individuals who act on behalf of PY or under its direction. This includes sub-grantees and partner organizations that receive funding, support, or resources from PY and are involved in implementing PY's programs and projects.
    - Contractors, consultants, and outside experts, including legal advocates and advisors, who provide services to PY are also subject to this policy. These entities and individuals must adhere to the same ethical standards and anti-bribery measures as PY employees.
    - Representatives and agents who act on PY's behalf, whether in a formal or informal capacity, are required to comply with this policy. This includes those involved in fundraising, advocacy, outreach, and other activities conducted in PY's name.

    - Any other organization or individual that acts under PY's direction, including those engaged in temporary or project-based assignments, are expected to understand and follow this policy.

**Key Aspects of the Scope:**

1. **Comprehensive Coverage:**
    - The policy is designed to cover all aspects of PY's operations, ensuring that bribery and corruption are addressed at every level of the organization. This includes interactions with government officials, private sector entities, non-governmental organizations, and other stakeholders.
    - By encompassing a wide range of individuals and entities, the policy ensures that PY's commitment to ethical conduct and anti-bribery measures is upheld across all its activities and relationships.
2. **Responsibilities and Expectations:**
    - All individuals and entities covered by this policy are expected to understand their responsibilities and the expectations placed upon them. This includes being aware of what constitutes bribery, the procedures for reporting suspected incidents, and the potential consequences of non-compliance.
    - PY will provide the necessary training and resources to ensure that Employees and Partners are equipped to comply with this policy. This includes regular training sessions, access to relevant documentation, and support from PY's compliance and ethics teams.
3. **Enforcement and Accountability:**
    - PY will enforce this policy rigorously, holding individuals and entities accountable for their actions. This includes implementing disciplinary measures for Employees who violate the policy, terminating agreements with Partners who fail to comply, and taking legal action where necessary.
    - PY will also monitor compliance with the policy through regular audits, reviews, and assessments. This includes evaluating the effectiveness of anti-bribery measures, identifying areas for improvement, and ensuring continuous adherence to ethical standards.
4. **Collaboration and Cooperation:**
    - PY will work collaboratively with its Partners to ensure a mutual understanding of and commitment to the policy. This includes providing guidance and support to Partners in implementing their own anti-bribery measures and fostering a culture of integrity and transparency.
    - PY will also cooperate with external authorities, donors, and other stakeholders to ensure compliance with relevant laws and regulations. This includes reporting credible evidence of bribery, participating in investigations, and taking corrective actions as required.

# 2. DEFINITIONS

**2.1 Bribe**

A "Bribe" is defined as any item of value given, offered, promised, or authorized with the intention of influencing the actions or decisions of an individual in a position of trust, to obtain an improper advantage, or to induce them to perform or refrain from performing any act in violation of their lawful duty. This definition encompasses a broad range of actions and items, recognizing that bribery can take many forms beyond direct financial payments.

**Key Elements of a Bribe:**

1. **Anything of Value:**
    - This includes, but is not limited to, money, gifts, loans, rewards, favors, services, discounts, hospitality, travel, entertainment, charitable donations, and any other benefits or advantages.
    - The value of the bribe can be monetary or non-monetary, tangible or intangible, direct or indirect. The critical factor is that it has value to the recipient or to someone associated with the recipient.
2. **Provided to a Person or Anyone Associated with that Person:**
    - A bribe can be given directly to the individual in a position of trust or to someone closely associated with them, such as a family member, friend, business associate, or organization with which they are connected.
    - This broad scope ensures that bribes intended to influence an individual indirectly through third parties are also covered.
3. **With the Purpose of Inducing the Person to Do or Omit to Do Any Act in Violation of Their Lawful Duty:**
    - The intention behind the bribe is to influence the recipient's actions, causing them to act or refrain from acting in a manner that they would not have done otherwise.
    - This includes both actions that violate legal duties and those that violate ethical standards or organizational policies.
4. **To Obtain Any Improper Advantage:**
    - The bribe is intended to secure an advantage that is not legitimately earned or deserved. This can include preferential treatment, favorable decisions, access to confidential information, or other benefits that the recipient would not have otherwise provided.
    - The improper advantage can be in any area of PY's operations, including procurement, funding, regulatory approvals, or contractual agreements.
5. **To Induce a Person Who is in a Position of Trust or Loyalty to an Organization to Use Their Influence to Improperly Affect or Influence Any Act or Decision of that Organization:**
    - The bribe aims to manipulate the recipient's influence within their organization to affect decisions or actions that benefit the briber.
    - This includes inducing the recipient to misuse their position to sway decisions in favor of the briber or to undermine the interests of the organization they represent.

**Examples of Bribes:**

- **Cash Payments:** Direct financial payments made to secure a contract, expedite a process, or influence a decision.

- **Gifts and Hospitality:** Offering expensive gifts, lavish meals, or extravagant entertainment to sway the recipient's judgment.
- **Employment Opportunities:** Providing job offers, internships, or other employment-related benefits to the recipient or their associates in exchange for favorable treatment.
- **Donations and Sponsorships:** Making charitable donations or sponsoring events with the expectation of receiving preferential treatment or access to opportunities.
- **Loans and Credit:** Offering loans on favorable terms or extending credit that would not be available under normal circumstances.

By defining bribery comprehensively, PY aims to ensure that all forms of undue influence are identified and addressed, thereby promoting ethical conduct and integrity in all its activities.

**2.2 Facilitation Payment**
A "Facilitation Payment" is a small payment made to expedite or secure the performance of a routine, non-discretionary governmental action by a government official. These payments, often referred to as "grease payments," are intended to hasten services to which the payer is already entitled.

**Characteristics of Facilitation Payments:**

1. **Purpose:**
    - The primary purpose of a facilitation payment is to expedite or secure the performance of a routine action that the government official is already obliged to perform. These actions are typically minor in nature and do not involve discretionary decision-making.
    - Facilitation payments are not intended to influence the outcome of the official's actions but rather to speed up processes or ensure timely service delivery.
2. **Routine Government Actions:**
    - Examples of routine governmental actions include processing visas, permits, or other official documents, providing police protection, mail services, or scheduling inspections related to contract performance or transit of goods.
    - These actions are generally standardized and should be provided by the government official in the ordinary course of their duties.
3. **Small Value:**
    - Facilitation payments are typically of small monetary value and are not substantial enough to constitute a significant financial incentive.
    - The value of the payment is usually nominal and intended merely to prompt the official to perform their duties without unnecessary delays.

**Examples of Facilitation Payments:**

- **Expediting Permits:** Paying a small fee to expedite the processing of a permit or license that the applicant is already entitled to receive.
- **Customs Clearance:** Making a minor payment to speed up the customs clearance of goods that are legally entitled to be imported or exported.
- **Utility Connections:** Providing a small payment to ensure timely connection or reconnection of utilities such as electricity, water, or telecommunications.

**Facilitation Payment Exceptions:**

1. **Payment Under Duress:**
    - Facilitation payments made under duress, where a reasonable person would believe they have no alternative but to make the payment to protect life, limb, or liberty, are not considered bribes. In such cases, the payment must be reported immediately according to the procedures established for reporting incidents of corruption.
2. **Payments in Accordance with Local Legal Requirements:**
    - Facilitation payments that are explicitly required or permitted by local written law (not local custom) are not considered bribes. Such payments must be documented and justified according to the relevant legal provisions.
3. **Payments with Prior Approval:**
    - Facilitation payments made with the prior approval of PY's Financial Secretary in consultation with the Board of Directors are authorized only if all possible efforts to avoid them have been made, the payment is as small as possible, and failure to make the payment would significantly negatively impact PY's ability to deliver essential services to beneficiaries.

By defining facilitation payments and establishing clear exceptions, PY aims to distinguish these payments from outright bribes while ensuring that such payments are strictly controlled and reported.

**2.3 Credible Evidence**

"Credible Evidence" refers to evidence that a reasonable person would believe to be reliable and trustworthy under the circumstances. It is the standard used to determine whether there is sufficient basis to suspect that bribery or corruption has occurred and to warrant further investigation.

**Key Attributes of Credible Evidence:**

1. **Reliability:**
    - Credible evidence is considered reliable if it comes from a trustworthy source and is consistent with other known facts or evidence.
    - The credibility of the source, the context in which the evidence was obtained, and the consistency of the evidence with other available information are all factors that contribute to its reliability.
2. **Relevance:**
    - Evidence must be directly relevant to the matter being investigated. It should pertain specifically to the allegations of bribery or corruption and provide information that supports or refutes those allegations.
    - Irrelevant or tangential evidence does not meet the standard of credible evidence.
3. **Corroboration:**
    - Whenever possible, evidence should be corroborated by additional sources or evidence. Corroboration strengthens the credibility of the evidence and reduces the likelihood of it being false or misleading.
    - Multiple pieces of evidence that independently support the same conclusion are considered more credible than uncorroborated evidence.
4. **Consistency:**

    - Credible evidence should be consistent with other known facts and evidence. Inconsistencies or contradictions within the evidence or with other established facts may undermine its credibility.
    - Consistency over time, across different sources, and with other relevant information enhances the credibility of the evidence.

**Examples of Credible Evidence:**

- **Documentary Evidence:** Contracts, receipts, invoices, emails, and other documents that support allegations of bribery or corruption.
- **Testimonial Evidence:** Statements from witnesses or individuals with firsthand knowledge of the alleged bribery or corruption.
- **Physical Evidence:** Tangible items such as financial records, money transfers, or other physical evidence that corroborate the allegations.
- **Circumstantial Evidence:** Evidence that indirectly supports the allegations through inference, such as patterns of behavior or unusual financial transactions.

By defining credible evidence, PY aims to ensure that all allegations of bribery and corruption are thoroughly and fairly investigated based on reliable and relevant information.

**2.4 Government Official**

A "Government Official" is defined as any officer or employee of a government or any government department, agency, or instrumentality, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, instrumentality, or public international organization. This definition is broad to encompass the wide range of individuals who may be in positions of power or influence within government or public sector entities.

**Key Characteristics of a Government Official:**

1. **Government Employees:**
    - Individuals employed by any level of government, including city, local, regional, national, or international governments. This includes both elected and appointed officials.
    - Examples include mayors, council members, civil servants, regulatory officials, and employees of government ministries or departments.
2. **Public International Organizations:**
    - Officers and employees of public international organizations, such as the United Nations, World Bank, International Monetary Fund, and other intergovernmental organizations.
    - This includes individuals working in any capacity for these organizations, whether permanent, temporary, or contractual.
3. **Persons Acting in an Official Capacity:**
    - Individuals who, although not formally employed by a government or public international organization, act on their behalf or in an official capacity. This includes contractors, consultants, advisors, and others who perform official duties or represent the organization.
    - Examples include consultants hired to advise a government agency, individuals serving on government-appointed committees, or private citizens acting under the authority of a government official.
4. **Politicians and Political Candidates:**

    - Individuals holding political office or running for political office at any level of government. This includes elected officials, candidates for election, and members of political parties holding official positions.
    - Examples include members of parliament, senators, governors, and candidates for any of these positions.

**Examples of Government Officials:**

- **Regulatory Officials:** Inspectors, auditors, and other officials responsible for enforcing regulations and standards.
- **Customs Officers:** Individuals responsible for overseeing the import and export of goods and enforcing customs laws.
- **Law Enforcement Personnel:** Police officers, detectives, and other members of law enforcement agencies.
- **Judicial Officials:** Judges, magistrates, prosecutors, and other members of the judiciary.

By defining government officials broadly, PY aims to ensure that all interactions with these individuals are conducted ethically and transparently, thereby preventing any form of bribery or undue influence.

**2.5 Employee**

An "Employee" encompasses all individuals engaged in any capacity with PY, including members of the Board of Directors, officers, management, employees, seconded employees, interns, and volunteers. This inclusive definition ensures that all individuals associated with PY understand their responsibilities under this policy.

**Categories of Employees:**

1. **Board of Directors:**
    - Members of PY's Board of Directors, including both executive and non-executive directors. Board members are responsible for setting strategic direction and overseeing the management of PY.
    - This includes individuals who serve on committees or subcommittees of the Board and those involved in governance and oversight roles.
2. **Officers and Management:**
    - Senior executives and managers who are responsible for implementing PY's policies and overseeing day-to-day operations. This includes the Chief Executive Officer, Chief Financial Officer, department heads, and other key management personnel.
    - Managers at all levels are expected to promote ethical behavior and compliance with this policy within their teams.
3. **Employees:**
    - All full-time, part-time, and temporary staff employed by PY. This includes individuals working in administrative, operational, technical, and support roles.
    - Employees are required to understand and comply with this policy, participate in relevant training, and report any suspected violations.
4. **Seconded Employees:**

    - Individuals who are temporarily assigned to PY from other organizations or entities. These employees are expected to adhere to PY's policies and standards during their secondment.
    - This includes individuals on loan from government agencies, partner organizations, or other entities.
5. **Interns:**
    - Individuals participating in internship programs with PY. Interns are provided with training and opportunities to gain experience, and they are expected to comply with PY's policies and ethical standards.
    - Interns may be involved in various projects and activities, and they must understand their responsibilities under this policy.
6. **Volunteers:**
    - Individuals who volunteer their time and services to PY. Volunteers play a crucial role in supporting PY's programs and initiatives, and they are expected to uphold the same ethical standards as paid employees.
    - This includes individuals involved in community outreach, event organization, and other volunteer activities.

By defining employees inclusively, PY ensures that all individuals associated with the organization are aware of their responsibilities and are committed to maintaining the highest standards of ethical conduct.

**2.6 Partner**
A "Partner" includes all external entities and individuals who act on behalf of PY or under its direction. This broad definition ensures that all those who collaborate with PY understand and comply with the organization's anti-bribery policies.

**Categories of Partners:**
1. **Sub-grantees:**
    - Organizations or entities that receive funding, support, or resources from PY to implement programs and projects. Sub-grantees are expected to adhere to PY's policies and ethical standards.
    - This includes local NGOs, community groups, and other entities that work in partnership with PY.
2. **Partner Organizations:**
    - Organizations that collaborate with PY on joint initiatives or projects. Partner organizations are required to comply with PY's anti-bribery policies and to report any incidents of bribery or corruption.
    - This includes international NGOs, governmental agencies, academic institutions, and other entities involved in collaborative efforts.
3. **Contractors:**
    - Individuals or companies contracted by PY to provide goods or services. Contractors are expected to adhere to PY's policies and to conduct their activities ethically and transparently.
    - This includes construction companies, suppliers, service providers, and other contractors.
4. **Consultants:**

    - Experts hired by PY to provide specialized knowledge or advice. Consultants are required to comply with PY's policies and to avoid any actions that could be construed as bribery or corruption.
    - This includes legal advisors, financial consultants, technical experts, and other consultants.
5. **Representatives and Agents:**
    - Individuals or entities that act on behalf of PY in various capacities. Representatives and agents are expected to adhere to PY's policies and to conduct their activities with integrity.
    - This includes fundraising agents, advocacy representatives, and other individuals or entities acting in PY's name.
6. **Any Other Organization or Individual Acting on PY's Behalf or at PY's Direction:**
    - This broad category ensures that all entities and individuals who work with PY, regardless of their specific role, are aware of their responsibilities under this policy.
    - This includes temporary workers, project-based staff, and others who contribute to PY's activities.

By defining partners broadly, PY aims to ensure that all those who collaborate with the organization understand their responsibilities and are committed to maintaining the highest standards of ethical conduct.

**2.7 Other Relevant Terms**

**Corruption:**

- As defined in PY's Anti-Corruption Policy, corruption involves the abuse of entrusted power for private gain. This includes a wide range of unethical behaviors such as bribery, embezzlement, fraud, and nepotism.
- Corruption undermines the integrity of PY's operations and can take many forms, including both petty and grand corruption.

**Assist(ing):**

- "Assisting" refers to (1) taking any act with the intention that it assist another person's violation of this policy; (2) failing to take action to inquire further or prevent a violation of this policy if you know of credible evidence that the violation will occur or has occurred ("willful ignorance"); or (3) participating in any way in an attempt to conceal or cover-up a violation of this policy.
- Assisting in bribery or corruption is a serious offense and is subject to the same penalties and disciplinary actions as direct involvement in such activities.

# 3. POLICY STATEMENT

### 3.1 Ethical Conduct and Accountability

Peace by Youth (PY) is dedicated to maintaining the highest standards of ethical conduct and accountability in all its operations. Our commitment to these principles is fundamental to our mission and the trust placed in us by our beneficiaries, donors, and stakeholders.

**Expectations for Honest and Ethical Behavior:**

1. **Integrity in All Actions:**
   - PY expects all Employees and Partners to act with integrity in all their professional dealings. This means being honest, transparent, and fair in every aspect of their work, avoiding any actions that could undermine the trust and confidence placed in PY.
   - Integrity involves adhering to both the letter and spirit of PY's policies, procedures, and ethical standards, ensuring that all actions reflect PY's commitment to ethical conduct.
2. **Accountability and Responsibility:**
   - All Employees and Partners are accountable for their actions and decisions. This includes taking responsibility for their conduct, ensuring that their actions align with PY's values and ethical standards, and being prepared to explain and justify their decisions.
   - Accountability also involves being proactive in preventing and addressing any ethical issues, including reporting any suspected or actual incidents of bribery or corruption.
3. **Respect for Laws and Regulations:**
   - PY requires all Employees and Partners to comply with all applicable laws, regulations, and standards in the countries where we operate. This includes adhering to anti-bribery and anti-corruption laws, as well as any other legal requirements relevant to our activities.
   - Compliance with laws and regulations is a fundamental aspect of ethical conduct, and any violations will be taken seriously and addressed promptly.
4. **Commitment to Transparency:**
   - PY is committed to conducting its operations with transparency and openness. This involves clear and honest communication with beneficiaries, donors, partners, and other stakeholders, ensuring that our actions and decisions are visible and understandable.
   - Transparency also means providing accurate and timely information about our activities, financial transactions, and any incidents of bribery or corruption, fostering a culture of openness and trust.
5. **Promoting Ethical Culture:**
   - Management at all levels is responsible for cultivating a culture that supports and strengthens the commitment to ethical conduct. This involves leading by example, promoting ethical behavior, and ensuring that all Employees and Partners understand and adhere to PY's ethical standards.
   - Promoting an ethical culture includes providing training and resources, encouraging open dialogue about ethical issues, and supporting those who report suspected violations of this policy.

By setting high expectations for honest and ethical behavior, PY aims to create an environment where integrity and accountability are integral to our operations, enhancing the trust and confidence of our beneficiaries, donors, and stakeholders.

### 3.2 Zero Tolerance for Bribery

PY takes a zero-tolerance stance towards bribery in any form. This policy underscores our commitment to preventing bribery and corruption, ensuring that all Employees and Partners understand the serious consequences of violating this policy.

**Clear Stance on Bribery and Consequences of Violations:**

1. **Prohibition of Bribery:**
   - PY strictly prohibits the giving, offering, promising, authorizing, or accepting of any form of bribe. This includes any item of value provided to influence the actions or decisions of an individual in a position of trust, to obtain an improper advantage, or to induce them to perform or refrain from performing any act in violation of their lawful duty.
   - The prohibition of bribery extends to all Employees and Partners, ensuring that no one associated with PY engages in or facilitates any form of bribery.
2. **Consequences for Violations:**
   - Employees who violate this prohibition will be subject to disciplinary action, up to and including termination of employment. Violations may also result in criminal prosecution, depending on the nature and severity of the offense.
   - Partners who violate this policy will be in breach of their agreement with PY and may have their agreements terminated. They may also be prohibited from working with PY in the future and may face legal action, including criminal prosecution.
3. **Reporting and Investigating Bribery:**
   - PY requires all Employees and Partners to immediately report any suspected or actual incidents of bribery. Reports should be made through the established reporting mechanisms, ensuring that all incidents are promptly and thoroughly investigated.
   - PY will review all reports to determine their credibility and will investigate any credible evidence of bribery, ensuring appropriate resolution. This includes cooperating with law enforcement and other relevant authorities to hold those responsible accountable.
4. **Protection Against Retaliation:**
   - PY will not tolerate any form of retaliation against Employees, Partners, or beneficiaries who report suspected violations of this policy in good faith. This includes protecting whistleblowers from adverse actions such as dismissal, demotion, harassment, or any other form of retaliation.
   - PY will also not tolerate abuse of the reporting system. Reports brought with knowledge that they are false or made in bad faith will be subject to disciplinary action.
5. **Commitment to Ethical Standards:**
   - By taking a zero-tolerance stance on bribery, PY reinforces its commitment to ethical standards and integrity. This policy is a critical component of PY's broader efforts to promote transparency, accountability, and trust in all its operations and activities.

    - PY will continually review and update its policies and procedures related to bribery prevention to ensure they remain effective and aligned with best practices and legal requirements.

Through this zero-tolerance approach, PY aims to eliminate bribery and corruption, ensuring that all Employees and Partners uphold the highest standards of ethical conduct.

**3.3 Facilitation Payments**
Facilitation payments are small payments made to expedite or secure the performance of a routine, non-discretionary governmental action by a government official. While such payments are sometimes considered a lesser form of bribery, PY recognizes that they can undermine ethical standards and create an environment conducive to more significant acts of corruption. Therefore, PY's policy on facilitation payments is stringent, with clearly defined exceptions and strict controls.

**Policy on Facilitation Payments and Exceptions:**

1. **General Prohibition of Facilitation Payments:**
    - PY generally prohibits the giving, offering, or authorizing of facilitation payments. All Employees and Partners must refrain from making such payments unless they fall within the specific exceptions outlined below.
    - The prohibition applies to all interactions with government officials, ensuring that PY's operations are conducted transparently and ethically without resorting to facilitation payments.
2. **Exceptions to the General Prohibition:**
    - There are limited circumstances under which facilitation payments may be permitted. These exceptions are designed to address situations where making a facilitation payment is unavoidable or necessary to protect life, limb, or liberty. Each exception is subject to strict conditions and reporting requirements.

**3.3.1 Payment Under Duress:**

- **Definition and Conditions:**
    - Facilitation payments made under duress will not result in disciplinary action. This exception applies in situations where a reasonable person would believe they have no alternative but to make the payment to protect life, limb, or liberty.
    - To qualify for this exception, the payment must be made in circumstances where there is an imminent threat to the individual's safety or freedom, and they believe that failure to make the payment would result in serious harm.
- **Reporting Requirements:**
    - If a facilitation payment is made under duress, the Employee or Partner must report the payment immediately. The report should be made in accordance with PY's established procedures for reporting incidents of corruption.
    - The report should include details of the circumstances leading to the payment, the amount paid, the recipient, and any other relevant information. This ensures that PY can review and address the incident appropriately.

**3.3.2 Payments in Accordance with Local Legal Requirements:**

- **Definition and Conditions:**

    - Facilitation payments that are explicitly required or permitted by local written law (not local custom) are allowed. Such payments are not considered bribes if they are documented and justified according to the relevant legal provisions.
    - This exception recognizes that certain legal frameworks may permit facilitation payments under specific conditions, and PY aims to ensure compliance with these legal requirements.
- **Reporting and Documentation:**
    - All facilitation payments made in accordance with local legal requirements must be thoroughly documented. This includes providing evidence of the legal provision that permits the payment, the amount paid, the recipient, and the purpose of the payment.
    - Employees and Partners must report these payments to PY's compliance team, ensuring that they are reviewed and recorded in PY's financial control system.

**3.3.3 Payments with Prior Approval:**
- **Definition and Conditions:**
    - Facilitation payments made with the prior approval of PY's Financial Secretary in consultation with the Board of Directors are authorized only if all possible efforts to avoid them have been made, the payment is as small as possible, and failure to make the payment would significantly negatively impact PY's ability to deliver essential services to beneficiaries.
    - This exception is designed for rare and exceptional circumstances where a facilitation payment is necessary to ensure the delivery of life-saving and immediately necessary goods or services.
- **Approval and Reporting:**
    - Prior to making a facilitation payment under this exception, the Employee or Partner must obtain written approval from PY's Financial Secretary. This approval process involves a thorough assessment of the necessity and potential impact of the payment.
    - Once the payment is made, it must be reported immediately, including details of the approval process, the amount paid, the recipient, and the justification for the payment. This ensures transparency and accountability in the use of facilitation payments.

**Compliance and Monitoring:**
1. **Training and Awareness:**
    - PY will provide regular training to all Employees and Partners on the policy regarding facilitation payments. This training will cover the general prohibition, the exceptions, and the procedures for obtaining approval and reporting payments.
    - Training sessions will also emphasize the importance of avoiding facilitation payments and the potential risks and consequences associated with them.
2. **Financial Controls:**
    - PY will maintain a comprehensive financial control system to ensure that all facilitation payments are properly accounted for and reviewed. This includes maintaining detailed records of all payments made under the exceptions and conducting regular audits to identify any irregularities.

    - The financial control system will also include procedures for reviewing and approving facilitation payments, ensuring that all such payments are subject to strict scrutiny and oversight.
3. **Incident Register:**
    - PY will maintain a register of all reported incidents of facilitation payments, including those made under duress, in accordance with local legal requirements, or with prior approval. This register will help identify trends, common issues, and areas for improvement in PY's anti-bribery efforts.
    - The incident register will be reviewed regularly by PY's compliance team and reported to the Audit Committee to ensure ongoing oversight and accountability.
4. **Continuous Improvement:**
    - PY is committed to continuously improving its policies and procedures related to bribery prevention, including those concerning facilitation payments. This includes regularly reviewing the effectiveness of the policy, incorporating feedback from Employees and Partners, and updating the policy as needed to address emerging risks and challenges.
    - PY will also stay informed about changes in legal requirements and best practices in anti-bribery measures, ensuring that its policies remain aligned with the highest standards of ethical conduct.

# 4. REPORTING AND INVESTIGATION

**4.1 Reporting Mechanisms**

To ensure the effective prevention and management of bribery incidents, Peace by Youth (PY) has established comprehensive reporting mechanisms that allow all Employees and Partners to report suspected or actual incidents of bribery promptly and securely.

**Procedures for Reporting Bribery Incidents:**

1. **Immediate Reporting:**
    - All Employees and Partners are required to report any suspected or actual incidents of bribery immediately. Reports should be made as soon as the individual becomes aware of the incident, ensuring timely action can be taken.
    - Reports can be made through various channels, including in-person reports to supervisors or managers, written reports, and electronic submissions through PY's internal reporting system.
2. **Designated Reporting Channels:**
    - PY has established multiple reporting channels to facilitate the reporting of bribery incidents. These channels include:
        - **Direct Reporting to Supervisors or Managers:** Employees and Partners can report incidents directly to their immediate supervisors or managers, who are then responsible for forwarding the report to the compliance team.
        - **Internal Reporting System:** PY has an internal electronic reporting system accessible through its intranet, allowing for secure and confidential reporting.
        - **Compliance Team:** Reports can be directly submitted to PY's compliance team via email, phone, or in-person meetings.
        - **Whistleblower Hotline:** PY maintains a dedicated whistleblower hotline that allows for anonymous reporting of bribery incidents (details provided below).
3. **Anonymous Reporting Hotlines:**
    - PY recognizes the importance of providing a safe and confidential means for reporting bribery incidents. Therefore, PY has established anonymous reporting hotlines that allow Employees and Partners to report incidents without revealing their identity.
    - The hotline is managed by an independent third-party service provider to ensure confidentiality and impartiality. The hotline is available 24/7 and can be accessed through multiple channels, including phone and online platforms.
    - Details of the hotline, including contact information and procedures for using it, are regularly communicated to all Employees and Partners through training sessions, internal communications, and PY's intranet.
4. **Reporting Requirements:**
    - When reporting a bribery incident, Employees and Partners should provide as much detail as possible to facilitate a thorough investigation. This includes:
        - Description of the incident, including the date, time, and location.
        - Names and roles of the individuals involved.

        - Details of any evidence supporting the report, such as documents, emails, or witness statements.
        - Any other relevant information that may assist in the investigation.
5. **Documentation and Record-Keeping:**
    - All reports of bribery incidents are documented and securely stored in PY's internal reporting system. This ensures that all reports are tracked, monitored, and reviewed, providing a comprehensive record of all reported incidents.
    - PY's compliance team is responsible for maintaining the confidentiality and integrity of all reports and ensuring that they are only accessible to authorized personnel.

By establishing clear procedures and providing multiple reporting channels, PY aims to encourage prompt and secure reporting of bribery incidents, ensuring that all reports are thoroughly investigated and appropriately addressed.

**4.2 Protection Against Retaliation**
PY is committed to protecting whistleblowers who report suspected or actual incidents of bribery in good faith. Retaliation against whistleblowers undermines the effectiveness of PY's anti-bribery efforts and discourages individuals from coming forward with valuable information.

**Assurance of Protection for Whistleblowers:**
1. **Zero Tolerance for Retaliation:**
    - PY maintains a zero-tolerance stance towards any form of retaliation against whistleblowers. This includes any adverse actions taken against individuals who report bribery incidents, such as dismissal, demotion, harassment, or any other form of retaliation.
    - PY will take disciplinary action against any Employee or Partner found to be engaging in retaliatory behavior, up to and including termination of employment or termination of agreements with Partners.
2. **Confidentiality and Anonymity:**
    - PY ensures the confidentiality of all whistleblowers to the greatest extent possible. The identity of whistleblowers is protected, and information provided by them is treated with the utmost confidentiality.
    - For those who wish to remain anonymous, PY's anonymous reporting hotlines provide a secure means to report bribery incidents without revealing their identity. The independent management of the hotline by a third-party service provider further ensures confidentiality.
3. **Support and Assistance:**
    - PY provides support and assistance to whistleblowers to ensure they feel safe and confident in reporting bribery incidents. This includes providing information about their rights and protections, as well as offering access to counseling and other support services if needed.
    - Whistleblowers are encouraged to report any concerns about retaliation to PY's compliance team, which will take immediate action to address and resolve any issues.
4. **Clear Communication of Policy:**

  - PY communicates its protection policy for whistleblowers clearly and regularly to all Employees and Partners. This includes training sessions, internal communications, and information provided on PY's intranet.
  - By ensuring that all Employees and Partners are aware of their rights and protections, PY aims to foster a culture of openness and trust, encouraging individuals to report bribery incidents without fear of retaliation.

By providing robust protections for whistleblowers, PY aims to encourage the reporting of bribery incidents and ensure that those who come forward are supported and protected.

**4.3 Investigation Process**

PY is committed to conducting thorough and impartial investigations of all credible reports of bribery. The investigation process is designed to ensure that all allegations are addressed promptly, fairly, and transparently, with appropriate actions taken to resolve the issues.

**Steps for Investigating Credible Reports of Bribery:**

1. **Initial Assessment:**
   - Upon receiving a report of bribery, PY's compliance team conducts an initial assessment to determine the credibility of the report. This involves reviewing the information provided, evaluating any supporting evidence, and assessing the potential impact of the alleged bribery.
   - The initial assessment aims to determine whether there is sufficient credible evidence to warrant a full investigation.
2. **Assignment of Investigation Team:**
   - If the initial assessment indicates that a full investigation is warranted, PY's compliance team assigns an investigation team to handle the case. The team typically includes individuals with relevant expertise and experience, ensuring a thorough and impartial investigation.
   - The investigation team operates independently to maintain objectivity and avoid any conflicts of interest.
3. **Investigation Plan:**
   - The investigation team develops a detailed investigation plan outlining the scope, objectives, and timeline of the investigation. The plan includes steps for gathering and analyzing evidence, interviewing witnesses, and reviewing relevant documents and records.
   - The plan also includes measures to protect the confidentiality and security of the investigation process, ensuring that all information is handled with care and discretion.
4. **Evidence Collection and Analysis:**
   - The investigation team collects and analyzes all relevant evidence related to the alleged bribery incident. This may include documents, emails, financial records, and other physical or digital evidence.
   - The team also conducts interviews with witnesses, including the individuals involved in the incident, to gather additional information and corroborate the evidence.
5. **Findings and Conclusions:**
   - Based on the evidence collected, the investigation team formulates its findings and conclusions. This includes determining whether the allegations

of bribery are substantiated and identifying any individuals or entities involved in the incident.
    - The findings and conclusions are documented in a detailed investigation report, which includes a summary of the evidence, an analysis of the findings, and recommendations for corrective actions.
6. **Recommendations and Corrective Actions:**
    - The investigation team provides recommendations for corrective actions based on the findings of the investigation. This may include disciplinary actions against individuals involved in the bribery incident, changes to policies and procedures, and measures to prevent future incidents.
    - PY's compliance team reviews the recommendations and ensures that appropriate actions are taken to address the issues and implement the recommended measures.
7. **Reporting and Communication:**
    - The findings and recommendations of the investigation are communicated to relevant stakeholders, including PY's senior management, the Board of Directors, and any external authorities as required.
    - The compliance team ensures that the results of the investigation are communicated transparently and that all stakeholders are informed of the actions taken to address the incident.
8. **Follow-Up and Monitoring:**
    - PY's compliance team monitors the implementation of corrective actions to ensure that they are effectively addressing the issues identified in the investigation. This includes regular follow-up to assess the impact of the measures and to identify any additional actions needed.
    - The compliance team also reviews and updates PY's policies and procedures based on the findings of the investigation, ensuring continuous improvement in bribery prevention and management.

By establishing a thorough and impartial investigation process, PY aims to ensure that all credible reports of bribery are addressed promptly and fairly, with appropriate actions taken to resolve the issues and prevent future incidents.

**4.4 Cooperation with Authorities**

PY is committed to cooperating fully with law enforcement and other relevant authorities in the investigation and prosecution of bribery incidents. This commitment reflects PY's dedication to upholding the highest standards of ethical conduct and ensuring accountability for all acts of bribery.

**PY's Commitment to Reporting and Cooperating with Law Enforcement:**

1. **Reporting to Authorities:**
    - PY will report credible evidence of bribery to the appropriate authorities as required by law or as determined necessary by PY. This includes reporting to law enforcement agencies, regulatory bodies, and other relevant authorities.
    - PY will also report bribery incidents to its donors and other stakeholders as required by donor agreements or other contractual obligations.
2. **Cooperation with Investigations:**
    - PY will cooperate fully with law enforcement and other relevant authorities in the investigation of bribery incidents. This includes providing access to

    relevant documents, records, and other evidence, as well as making Employees and Partners available for interviews and other investigative activities.
  - PY's compliance team will serve as the primary point of contact for authorities, ensuring effective communication and coordination throughout the investigation process.
3. **Compliance with Legal Obligations:**
   - PY will comply with all legal obligations related to the reporting and investigation of bribery incidents. This includes adhering to relevant anti-bribery and anti-corruption laws, regulations, and standards in the countries where PY operates.
   - PY will also ensure that its actions are consistent with its internal policies and procedures, as well as with any agreements or commitments made to donors and other stakeholders.
4. **Supporting Prosecution Efforts:**
   - PY will support the prosecution of individuals or entities involved in bribery incidents to ensure that those responsible are held accountable. This includes providing evidence, testimony, and other support to law enforcement and prosecutorial authorities.
   - PY will also work with authorities to identify and address any systemic issues or weaknesses that may have contributed to the bribery incident, ensuring that similar issues are prevented in the future.
5. **Transparency and Accountability:**
   - PY is committed to maintaining transparency and accountability throughout the reporting and investigation process. This includes providing regular updates to relevant stakeholders on the status and outcomes of investigations and ensuring that all actions taken are documented and communicated transparently.
   - PY will also engage with donors, partners, and other stakeholders to ensure that they are informed of any significant developments related to bribery incidents and the actions taken to address them.

By committing to full cooperation with authorities, PY aims to ensure that all acts of bribery are thoroughly investigated and prosecuted, reinforcing its dedication to ethical conduct and accountability.

# 5. COMPLIANCE AND MONITORING

To ensure the effective implementation and adherence to its Anti-Bribery Policy, Peace by Youth (PY) has established comprehensive compliance and monitoring mechanisms. These mechanisms are designed to promote transparency, accountability, and continuous improvement in PY's anti-bribery efforts.

## 5.1 Financial Controls

PY recognizes that robust financial controls are essential to prevent and detect bribery and corruption. These controls ensure that all expenses are properly accounted for and that financial transactions are conducted transparently and ethically.

**Systems to Ensure All Expenses are Properly Accounted For:**

1. **Comprehensive Financial Control System:**
   - PY maintains a comprehensive financial control system that includes detailed procedures for recording, authorizing, and reviewing all financial transactions. This system ensures that all expenses are accurately documented and that appropriate approvals are obtained for all expenditures.
   - The financial control system is designed to provide a clear audit trail for all transactions, facilitating the detection and investigation of any irregularities or suspicious activities.
2. **Segregation of Duties:**
   - PY enforces the segregation of duties within its financial processes to prevent any single individual from having control over all aspects of a financial transaction. This separation of responsibilities reduces the risk of fraud and ensures that transactions are subject to multiple levels of review.
   - Key financial roles, such as authorization, recording, and reconciliation, are assigned to different individuals or departments to enhance accountability and oversight.
3. **Expense Approval and Authorization:**
   - All expenses incurred by PY must be approved and authorized by designated personnel in accordance with PY's financial policies and procedures. This includes verifying the legitimacy of the expense, ensuring it is necessary for PY's operations, and confirming that it complies with PY's anti-bribery policy.
   - Higher levels of approval are required for significant or unusual expenses, providing an additional layer of scrutiny and oversight.
4. **Regular Financial Audits:**
   - PY conducts regular financial audits to review and verify the accuracy and completeness of its financial records. These audits are conducted by internal auditors as well as external independent auditors to ensure objectivity and thoroughness.
   - Audit findings are reported to PY's senior management and the Board of Directors, and any identified issues are promptly addressed to enhance financial controls and prevent future occurrences.
5. **Monitoring and Reconciliation:**
   - PY's financial team regularly monitors and reconciles all financial transactions to ensure they are consistent with approved budgets and

    - financial plans. This includes reviewing bank statements, expense reports, and other financial documents to identify and investigate any discrepancies.
    - Regular reconciliation helps to ensure that all expenses are accurately recorded and that any irregularities are promptly detected and addressed.

By maintaining a robust financial control system, PY aims to ensure that all expenses are properly accounted for, promoting transparency and accountability in its financial transactions and reducing the risk of bribery and corruption.

**5.2 Gift and Hospitality Policies**
PY recognizes that gifts and hospitality can play a role in building and maintaining relationships with stakeholders. However, it is essential to ensure that such practices do not influence decision-making processes or create conflicts of interest. PY has established clear guidelines for acceptable gifts and hospitality to prevent any misuse or abuse.

**Guidelines for Acceptable Gifts and Hospitality:**

1. **General Principles:**
    - PY's policy on gifts and hospitality is based on the principles of transparency, proportionality, and appropriateness. All gifts and hospitality offered or received must be reasonable, modest, and directly related to PY's legitimate business interests.
    - Gifts and hospitality must never be offered or accepted if they could influence, or appear to influence, the outcome of a decision or create an obligation on the part of the recipient.
2. **Acceptable Gifts:**
    - Modest gifts of nominal value, such as promotional items (e.g., pens, calendars), may be accepted or offered, provided they are not intended to influence any decision-making process.
    - Gifts that are customary and appropriate in the context of local cultural practices may be accepted, provided they comply with PY's guidelines and are disclosed and recorded as required.
3. **Prohibited Gifts:**
    - Cash or cash equivalents (e.g., gift cards, vouchers) are strictly prohibited, as they can easily be used to influence decisions or actions.
    - Gifts that are extravagant or excessive in value, or that could create a perception of impropriety, are also prohibited.
4. **Hospitality:**
    - Hospitality, such as meals, entertainment, or travel, may be accepted or offered if it is reasonable, proportionate, and directly related to PY's business activities. Hospitality should not be lavish or excessive and must be transparent and appropriately documented.
    - Invitations to events or activities that are primarily of a social nature and not related to PY's business interests should generally be declined.
5. **Disclosure and Documentation:**
    - All gifts and hospitality offered or received must be disclosed and documented in accordance with PY's procedures. This includes providing details of the gift or hospitality, the giver and recipient, the value, and the purpose or context.

- PY maintains a gift and hospitality register to record all disclosed items, ensuring transparency and accountability. The register is regularly reviewed by PY's compliance team to identify any potential issues or trends.

6. **Approval Requirements:**
    - Gifts and hospitality that exceed a certain value threshold, as defined by PY's policies, must be approved by a designated senior manager or the compliance team before acceptance or offering.
    - Approval is also required for any gifts or hospitality that could potentially create a conflict of interest or have an impact on PY's business relationships.

By establishing clear guidelines for acceptable gifts and hospitality, PY aims to prevent any undue influence on its operations and ensure that all interactions with stakeholders are conducted ethically and transparently.

**5.3 Training and Certification**
Training and certification are critical components of PY's anti-bribery compliance program. Regular training ensures that all Employees and Partners understand PY's anti-bribery policy, their responsibilities under the policy, and the importance of ethical conduct.

**Regular Training for Employees on the Anti-Bribery Policy:**

1. **Mandatory Training:**
    - All Employees and Partners are required to participate in mandatory training sessions on PY's anti-bribery policy. These training sessions are conducted regularly to ensure that everyone is aware of the policy and any updates or changes.
    - The training covers key aspects of the anti-bribery policy, including the definition of bribery, prohibited activities, reporting mechanisms, and the consequences of violations.
2. **Tailored Training Programs:**
    - PY offers tailored training programs to address the specific needs and roles of different groups within the organization. For example, senior management, procurement staff, and field personnel may receive specialized training relevant to their responsibilities.
    - Tailored training ensures that all Employees and Partners receive relevant and practical information that is directly applicable to their roles and activities.
3. **Interactive and Engaging Formats:**
    - Training sessions are designed to be interactive and engaging, using a variety of formats such as workshops, seminars, e-learning modules, and case studies. This approach helps to ensure that participants fully understand and retain the information.
    - Real-life scenarios and examples are used to illustrate key concepts and encourage discussion and critical thinking.
4. **Regular Refresher Training:**
    - In addition to initial training, PY provides regular refresher training to reinforce key messages and update Employees and Partners on any changes to the anti-bribery policy. Refresher training helps to maintain awareness and vigilance against bribery and corruption.

    - Refresher training is conducted annually or more frequently as needed, depending on the nature of the activities and the level of risk.
5. **Evaluation and Feedback:**
    - PY evaluates the effectiveness of its training programs through participant feedback, assessments, and monitoring of compliance. Feedback is used to continuously improve the training content and delivery methods.
    - Assessments, such as quizzes or tests, are used to measure participants' understanding of the policy and identify areas where additional training or clarification may be needed.

**Mandatory Certification of Policy Understanding and Compliance:**

1. **Certification Requirement:**
    - All Employees and Partners are required to certify their understanding of PY's anti-bribery policy and their commitment to comply with it. Certification is obtained upon completion of the training program and must be renewed regularly.
    - The certification process includes a formal declaration that the individual has read, understood, and agrees to adhere to the anti-bribery policy.
2. **Tracking and Monitoring:**
    - PY maintains records of all certifications to ensure that all Employees and Partners have completed the required training and certification. These records are monitored by the compliance team to ensure ongoing compliance.
    - Non-compliance with the certification requirement is addressed promptly, with appropriate follow-up and remedial actions taken as needed.
3. **Annual Renewal:**
    - Certification of policy understanding and compliance is renewed annually to ensure that all Employees and Partners remain informed and committed to PY's anti-bribery standards. Annual renewal also provides an opportunity to update individuals on any changes to the policy or related procedures.
    - The annual renewal process includes a review of the policy, participation in refresher training, and re-certification of compliance.
4. **Support and Resources:**
    - PY provides ongoing support and resources to help Employees and Partners understand and comply with the anti-bribery policy. This includes access to training materials, guidance documents, and the compliance team for any questions or concerns.
    - PY's intranet and other communication channels are used to disseminate information and updates related to the anti-bribery policy and compliance requirements.

By providing regular training and requiring mandatory certification, PY ensures that all Employees and Partners are knowledgeable about the anti-bribery policy and committed to ethical conduct.

**5.4 Partner Due Diligence**

Effective due diligence on partners is essential to ensure that PY's anti-bribery standards are upheld by all entities and individuals associated with its operations. PY has established procedures for evaluating and monitoring partners to prevent and detect any potential bribery risks.

**Procedures for Evaluating and Monitoring Partners:**

1. **Initial Due Diligence:**
    - Before entering into any partnership or contractual agreement, PY conducts a thorough due diligence assessment of the prospective partner. This assessment includes evaluating the partner's reputation, ethical standards, and compliance with anti-bribery laws and regulations.
    - The due diligence process involves reviewing the partner's background, financial stability, legal history, and any previous incidents of bribery or corruption. References and third-party verification may also be used to validate the partner's integrity and reliability.
2. **Risk Assessment:**
    - PY assesses the level of bribery risk associated with each partner based on factors such as the nature of the relationship, the partner's location and industry, and the scope of the partnership. High-risk partners are subject to more extensive due diligence and monitoring.
    - The risk assessment helps PY to identify and prioritize areas where additional controls and oversight may be needed to mitigate bribery risks.
3. **Contractual Requirements:**
    - All contracts and agreements with partners include specific anti-bribery clauses that require compliance with PY's anti-bribery policy and relevant laws. These clauses outline the partner's obligations to prevent bribery, report any incidents, and cooperate with PY's compliance efforts.
    - Partners are required to certify their commitment to ethical conduct and to implement adequate anti-bribery measures within their own operations.
4. **Ongoing Monitoring:**
    - PY continuously monitors its partners to ensure ongoing compliance with anti-bribery standards. This includes regular reviews of the partner's activities, performance, and adherence to contractual obligations.
    - Monitoring may involve site visits, audits, and periodic assessments of the partner's compliance programs and internal controls.
5. **Incident Reporting and Investigation:**
    - Partners are required to report any suspected or actual incidents of bribery to PY immediately. PY investigates all reported incidents thoroughly and takes appropriate actions to address any violations.
    - Failure to comply with PY's anti-bribery policy or to report incidents may result in termination of the partnership and legal action.
6. **Capacity Building and Support:**
    - PY provides support and resources to help partners strengthen their anti-bribery measures. This includes training, guidance, and access to best practices in bribery prevention.
    - PY works collaboratively with partners to ensure that they understand and implement effective anti-bribery controls, fostering a culture of integrity and compliance.

By implementing rigorous due diligence and monitoring procedures, PY ensures that its partners uphold the same high standards of ethical conduct and contribute to the prevention of bribery in all its operations.

### 5.5 INCIDENT REGISTER

Maintaining a comprehensive incident register is a key component of PY's compliance and monitoring efforts. The register provides a detailed record of all reported bribery incidents and exceptions, facilitating transparency, accountability, and continuous improvement.

**Maintenance of a Register of Bribery Incidents and Exceptions:**

1. **Recording Incidents:**
    - All reported incidents of bribery, including those involving facilitation payments and other exceptions, are recorded in PY's incident register. This includes detailed information about the incident, such as the date, time, location, individuals involved, and the nature of the bribery.
    - The register also includes information about the steps taken to investigate and resolve each incident, as well as any corrective actions implemented.
2. **Confidentiality and Security:**
    - The incident register is maintained securely and confidentially to protect the privacy of individuals involved and the integrity of the information. Access to the register is restricted to authorized personnel within PY's compliance team and senior management.
    - Security measures, such as encryption and access controls, are implemented to prevent unauthorized access and ensure the confidentiality of the records.
3. **Regular Review and Analysis:**
    - PY's compliance team regularly reviews and analyzes the incident register to identify trends, patterns, and common issues related to bribery incidents. This analysis helps to inform PY's risk assessment and mitigation strategies.
    - The compliance team also evaluates the effectiveness of corrective actions and identifies opportunities for improving PY's anti-bribery measures.
4. **Reporting to Senior Management and the Board:**
    - The findings and analysis from the incident register are reported to PY's senior management and the Board of Directors on a regular basis. This ensures that leadership is informed about the status of bribery incidents and the effectiveness of the compliance program.
    - The reports include recommendations for further actions or policy changes to enhance PY's anti-bribery efforts.
5. **Continuous Improvement:**
    - The incident register serves as a valuable tool for continuous improvement in PY's anti-bribery measures. Insights gained from the register are used to update policies, procedures, and training programs, ensuring that PY's anti-bribery efforts remain effective and responsive to emerging risks.
    - PY's commitment to continuous improvement includes regularly reviewing and updating the incident register itself to ensure it remains comprehensive and useful.

By maintaining a detailed incident register, PY promotes transparency and accountability in its anti-bribery efforts, ensuring that all incidents are tracked, analyzed, and addressed effectively.

## 6. PROCESSES AND PROCEDURES

To ensure the effective implementation of its Anti-Bribery Policy, Peace by Youth (PY) has established a comprehensive set of processes and procedures. These processes and procedures are designed to integrate anti-bribery principles into all aspects of PY's operations, ensure systematic handling of bribery reports, conduct regular audits, and promote continuous improvement.

### 6.1 Employment Codes of Conduct

PY is committed to fostering a culture of integrity and ethical behavior among its Employees. To achieve this, PY integrates anti-bribery principles into its employment codes of conduct, ensuring that all Employees understand and adhere to these principles.

**Integration of Anti-Bribery Principles into Employment Codes:**

1. **Code of Conduct Overview:**
    - PY's Code of Conduct outlines the organization's expectations for ethical behavior and compliance with all applicable laws and regulations. It serves as a guiding document for all Employees, providing clear standards for professional conduct.
    - The Code of Conduct explicitly incorporates anti-bribery principles, emphasizing PY's zero-tolerance stance on bribery and corruption.
2. **Key Anti-Bribery Provisions:**
    - **Prohibition of Bribery:** The Code of Conduct clearly states that offering, giving, receiving, or soliciting bribes is strictly prohibited. This includes any form of payment, gift, or favor intended to influence the actions or decisions of an individual in a position of trust.
    - **Facilitation Payments:** The Code of Conduct outlines PY's policy on facilitation payments, including the specific exceptions and the requirement for prior approval and reporting.
    - **Gifts and Hospitality:** The Code of Conduct provides guidelines for acceptable gifts and hospitality, ensuring that such practices do not compromise the integrity of PY's operations or create conflicts of interest.
    - **Reporting Obligations:** The Code of Conduct mandates that all Employees report any suspected or actual incidents of bribery. It details the reporting mechanisms available and assures protection against retaliation for whistleblowers.
3. **Employee Acknowledgment:**
    - All Employees are required to acknowledge and certify their understanding of the Code of Conduct upon joining PY and periodically thereafter. This certification process reinforces the importance of the anti-bribery principles and ensures ongoing compliance.
    - The acknowledgment includes a commitment to adhere to the anti-bribery provisions and to report any violations promptly.
4. **Training and Awareness:**
    - PY provides regular training on the Code of Conduct, with a specific focus on the anti-bribery provisions. This training ensures that all Employees are aware of the standards expected of them and understand how to comply with the policy.

    - Training sessions include real-life scenarios and case studies to illustrate the application of the anti-bribery principles in various situations.
5. **Disciplinary Measures:**
    - The Code of Conduct outlines the disciplinary measures for violations of the anti-bribery provisions. These measures range from warnings and reprimands to termination of employment and legal action, depending on the severity of the violation.
    - The disciplinary process is designed to be fair and transparent, ensuring that all Employees are held accountable for their actions.

By integrating anti-bribery principles into its employment codes of conduct, PY ensures that all Employees understand their responsibilities and are committed to upholding the highest standards of ethical behavior.

**6.2 Systematic Review and Investigation**
PY has established a detailed process for handling reports of bribery to ensure that all allegations are thoroughly investigated and appropriately addressed. This systematic approach ensures transparency, fairness, and accountability in dealing with bribery incidents.

**Detailed Process for Handling Bribery Reports:**

1. **Receipt of Report:**
    - Bribery reports can be received through various channels, including direct reports to supervisors, the internal reporting system, the compliance team, or the anonymous whistleblower hotline.
    - All reports are promptly documented and forwarded to PY's compliance team for initial assessment.
2. **Initial Assessment:**
    - The compliance team conducts an initial assessment to determine the credibility of the report. This involves reviewing the information provided, evaluating any supporting evidence, and assessing the potential impact of the alleged bribery.
    - If the initial assessment indicates that the report is credible, a full investigation is initiated.
3. **Investigation Planning:**
    - An investigation team is assigned to handle the case. The team develops a detailed investigation plan outlining the scope, objectives, and timeline of the investigation.
    - The plan includes steps for gathering and analyzing evidence, interviewing witnesses, and reviewing relevant documents and records.
4. **Evidence Collection and Analysis:**
    - The investigation team collects and analyzes all relevant evidence related to the alleged bribery incident. This may include documents, emails, financial records, and other physical or digital evidence.
    - The team also conducts interviews with witnesses, including the individuals involved in the incident, to gather additional information and corroborate the evidence.
5. **Findings and Conclusions:**

- Based on the evidence collected, the investigation team formulates its findings and conclusions. This includes determining whether the allegations of bribery are substantiated and identifying any individuals or entities involved in the incident.
    - The findings and conclusions are documented in a detailed investigation report, which includes a summary of the evidence, an analysis of the findings, and recommendations for corrective actions.
6. **Recommendations and Corrective Actions:**
    - The investigation team provides recommendations for corrective actions based on the findings of the investigation. This may include disciplinary actions against individuals involved in the bribery incident, changes to policies and procedures, and measures to prevent future incidents.
    - PY's compliance team reviews the recommendations and ensures that appropriate actions are taken to address the issues and implement the recommended measures.
7. **Reporting and Communication:**
    - The findings and recommendations of the investigation are communicated to relevant stakeholders, including PY's senior management, the Board of Directors, and any external authorities as required.
    - The compliance team ensures that the results of the investigation are communicated transparently and that all stakeholders are informed of the actions taken to address the incident.
8. **Follow-Up and Monitoring:**
    - PY's compliance team monitors the implementation of corrective actions to ensure that they are effectively addressing the issues identified in the investigation. This includes regular follow-up to assess the impact of the measures and to identify any additional actions needed.
    - The compliance team also reviews and updates PY's policies and procedures based on the findings of the investigation, ensuring continuous improvement in bribery prevention and management.

By establishing a detailed process for handling bribery reports, PY ensures that all allegations are addressed promptly and fairly, with appropriate actions taken to resolve the issues and prevent future incidents.

**6.3 Audit and Monitoring**
Regular audits and monitoring are essential to ensure compliance with PY's Anti-Bribery Policy and to assess the effectiveness of the anti-bribery measures in place. PY has established a robust audit and monitoring framework to achieve these objectives.

**Regular Audits to Ensure Policy Compliance and Effectiveness:**

1. **Internal Audits:**
    - PY conducts regular internal audits to review and assess compliance with the Anti-Bribery Policy. These audits are carried out by PY's internal audit team, which operates independently to ensure objectivity and impartiality.
    - Internal audits focus on evaluating the implementation of the anti-bribery measures, identifying any weaknesses or gaps, and assessing the overall effectiveness of the policy.
2. **External Audits:**

    - In addition to internal audits, PY engages external independent auditors to conduct periodic audits of its anti-bribery compliance program. External audits provide an additional layer of assurance and credibility, ensuring that PY's anti-bribery efforts are subject to rigorous scrutiny.
    - External auditors review PY's financial records, internal controls, and compliance processes to verify adherence to the Anti-Bribery Policy and to identify any areas for improvement.
3. **Audit Scope and Objectives:**
    - The scope of the audits includes a comprehensive review of all aspects of PY's anti-bribery measures, including financial controls, reporting mechanisms, training programs, and partner due diligence.
    - The primary objectives of the audits are to verify compliance with the policy, assess the effectiveness of the anti-bribery measures, and identify any potential risks or vulnerabilities.
4. **Audit Findings and Recommendations:**
    - The audit teams document their findings and provide detailed reports outlining any non-compliance issues, weaknesses, or areas for improvement. The reports include recommendations for corrective actions and enhancements to the anti-bribery measures.
    - PY's compliance team reviews the audit findings and ensures that the recommended actions are implemented promptly and effectively.
5. **Follow-Up and Continuous Monitoring:**
    - PY's compliance team conducts follow-up reviews to monitor the implementation of the audit recommendations and to ensure that any identified issues are addressed effectively.
    - Continuous monitoring involves regular reviews of financial transactions, compliance reports, and other relevant data to detect and address any potential bribery risks in real-time.
6. **Reporting to Senior Management and the Board:**
    - The findings and recommendations from the audits are reported to PY's senior management and the Board of Directors. This ensures that leadership is informed about the status of the anti-bribery compliance program and any actions taken to address identified issues.
    - Regular reporting to the Board enhances oversight and accountability, ensuring that PY's anti-bribery efforts are aligned with its overall governance and risk management framework.

By conducting regular audits and continuous monitoring, PY ensures that its Anti-Bribery Policy is effectively implemented and that any compliance issues are promptly identified and addressed.

**6.4 Continuous Improvement**
Continuous improvement is a fundamental aspect of PY's approach to bribery prevention and management. PY is committed to regularly reviewing and updating its policies and procedures to ensure they remain effective and responsive to emerging risks and challenges.

**Ongoing Review and Update of Policies and Procedures:**
1. **Regular Policy Review:**

- PY conducts regular reviews of its Anti-Bribery Policy and related procedures to ensure they remain relevant and effective. This includes reviewing the policy in light of changes in laws, regulations, and industry best practices.
- The policy review process involves input from various stakeholders, including PY's compliance team, legal advisors, senior management, and the Board of Directors.

2. **Stakeholder Feedback:**
    - PY actively seeks feedback from Employees, Partners, and other stakeholders on the effectiveness of the Anti-Bribery Policy and procedures. This feedback is gathered through surveys, interviews, and regular communication channels.
    - Stakeholder feedback is used to identify any areas where the policy may need to be updated or enhanced to better address the needs and concerns of those involved.
3. **Benchmarking and Best Practices:**
    - PY benchmarks its anti-bribery measures against industry standards and best practices to ensure that its policies and procedures are aligned with leading practices in bribery prevention and management.
    - PY participates in industry forums, networks, and conferences to stay informed about emerging trends, challenges, and innovations in the field of anti-bribery compliance.
4. **Risk Assessment and Mitigation:**
    - PY conducts regular risk assessments to identify and evaluate potential bribery risks in its operations and activities. These assessments are used to inform the development and implementation of risk mitigation strategies.
    - The risk assessment process includes analyzing historical data, reviewing current practices, and identifying any emerging risks or vulnerabilities.
5. **Policy Updates and Communication:**
    - Based on the findings from policy reviews, stakeholder feedback, benchmarking, and risk assessments, PY updates its Anti-Bribery Policy and procedures as needed. Updates are communicated promptly to all Employees and Partners to ensure they are aware of the changes and understand their implications.
    - Training programs and resources are updated to reflect any changes to the policy, ensuring that all stakeholders remain informed and compliant.
6. **Innovation and Technology:**
    - PY leverages technology and innovation to enhance its anti-bribery measures. This includes using data analytics, artificial intelligence, and other advanced tools to monitor financial transactions, detect anomalies, and identify potential bribery risks.
    - PY continuously explores new technologies and approaches to improve the effectiveness and efficiency of its anti-bribery compliance program.
7. **Commitment to Ethical Leadership:**
    - PY's leadership is committed to promoting a culture of integrity and ethical behavior. This commitment is demonstrated through regular communication, setting a strong example, and supporting continuous improvement in bribery prevention and management.

- Senior management and the Board of Directors actively participate in the review and enhancement of the Anti-Bribery Policy and procedures, ensuring that ethical considerations are integrated into PY's strategic decision-making.

By committing to continuous improvement, PY ensures that its Anti-Bribery Policy and procedures remain effective, relevant, and responsive to changing circumstances. This proactive approach helps PY to maintain the highest standards of ethical conduct and to prevent bribery in all its operations.

## 7. ROLES AND RESPONSIBILITIES

To ensure the effective implementation and enforcement of the Anti-Bribery Policy, Peace by Youth (PY) has clearly defined the roles and responsibilities of key individuals and groups within the organization. These roles and responsibilities ensure accountability, promote a culture of ethical behavior, and support compliance with the policy across all levels of PY.

### 7.1 Chief Financial Officer and Director of Finance

The Chief Financial Officer (CFO) and the Director of Finance hold the overall responsibility for the administration and compliance of PY's Anti-Bribery Policy. Their roles are critical in ensuring that the policy is effectively implemented, monitored, and enforced.

**Overall Responsibility for Policy Administration and Compliance:**

1. **Policy Development and Review:**
   - The CFO and Director of Finance are responsible for developing and regularly reviewing the Anti-Bribery Policy to ensure it remains relevant, effective, and aligned with current laws and best practices.
   - They work closely with the compliance team, legal advisors, and senior management to update the policy as needed and to address any emerging bribery risks or regulatory changes.
2. **Implementation and Oversight:**
   - The CFO and Director of Finance oversee the implementation of the Anti-Bribery Policy across all PY operations and activities. This includes ensuring that all Employees and Partners are aware of the policy and understand their responsibilities.
   - They are responsible for establishing and maintaining the necessary systems, processes, and controls to support compliance with the policy.
3. **Training and Communication:**
   - The CFO and Director of Finance ensure that regular training on the Anti-Bribery Policy is provided to all Employees and Partners. They oversee the development of training programs and materials, ensuring that they are comprehensive and up-to-date.
   - They also ensure that the policy is effectively communicated throughout the organization, using various channels such as workshops, intranet updates, and internal communications.
4. **Monitoring and Reporting:**
   - The CFO and Director of Finance are responsible for monitoring compliance with the Anti-Bribery Policy. This includes overseeing regular audits, risk assessments, and incident investigations.
   - They ensure that any reported incidents of bribery are thoroughly investigated and that appropriate corrective actions are taken. They also report on the status of compliance efforts to senior management and the Board of Directors.
5. **Continuous Improvement:**
   - The CFO and Director of Finance lead efforts to continuously improve the Anti-Bribery Policy and related procedures. This includes incorporating feedback from audits, investigations, and training programs, as well as

staying informed about industry best practices and regulatory developments.
   - They work to ensure that PY's anti-bribery measures remain effective and responsive to changing circumstances.

**7.2 Management and Board of Directors**

Management and the Board of Directors play a crucial role in cultivating a culture of ethical behavior and supporting the enforcement of the Anti-Bribery Policy. Their leadership and commitment are essential to ensuring that PY upholds the highest standards of integrity and accountability.

**Cultivating a Culture of Ethical Behavior and Supporting Policy Enforcement:**

1. **Leadership and Commitment:**
   - Management and the Board of Directors are responsible for setting the tone at the top, demonstrating a strong commitment to ethical behavior and compliance with the Anti-Bribery Policy.
   - They lead by example, ensuring that their actions and decisions reflect PY's values and commitment to preventing bribery and corruption.
2. **Policy Enforcement:**
   - Management and the Board of Directors support the enforcement of the Anti-Bribery Policy by ensuring that violations are addressed promptly and appropriately. They oversee the implementation of disciplinary measures for breaches of the policy, ensuring that all actions are fair and transparent.
   - They also support the compliance team and other relevant departments in their efforts to monitor and enforce the policy.
3. **Resource Allocation:**
   - Management and the Board of Directors ensure that adequate resources are allocated to support the implementation and enforcement of the Anti-Bribery Policy. This includes funding for training programs, compliance initiatives, and audit activities.
   - They also ensure that the compliance team has the necessary authority and support to carry out its responsibilities effectively.
4. **Strategic Oversight:**
   - The Board of Directors provides strategic oversight of PY's anti-bribery efforts, ensuring that they are integrated into the organization's overall governance and risk management framework.
   - They regularly review reports on compliance activities, audit findings, and risk assessments, and provide guidance on addressing any identified issues or risks.
5. **Stakeholder Engagement:**
   - Management and the Board of Directors engage with key stakeholders, including donors, partners, and regulatory authorities, to demonstrate PY's commitment to ethical behavior and anti-bribery compliance.
   - They ensure that PY's anti-bribery efforts are communicated transparently and that stakeholders are informed about the measures in place to prevent and address bribery.

By actively promoting and supporting the Anti-Bribery Policy, management and the Board of Directors play a vital role in fostering a culture of integrity and ensuring that PY remains committed to ethical conduct and compliance.

**7.3 Employees and Partners**

All Employees and Partners have a critical role to play in ensuring the effectiveness of PY's Anti-Bribery Policy. Their individual responsibility for understanding and adhering to the policy is essential to maintaining PY's commitment to preventing bribery and corruption.

**Individual Responsibility for Understanding and Adhering to the Policy:**

1. **Policy Awareness and Understanding:**
   - All Employees and Partners are responsible for familiarizing themselves with PY's Anti-Bribery Policy and understanding its provisions. This includes participating in mandatory training sessions and reviewing policy updates and communications.
   - Employees and Partners should seek clarification from their supervisors, the compliance team, or other relevant departments if they have any questions or concerns about the policy.
2. **Adherence to the Policy:**
   - Employees and Partners must adhere to the Anti-Bribery Policy in all their professional activities and interactions. This includes complying with the guidelines on gifts and hospitality, reporting suspected bribery incidents, and avoiding any actions that could be perceived as bribery or corruption.
   - They are also responsible for ensuring that their actions align with PY's values and commitment to ethical conduct.
3. **Reporting Obligations:**
   - Employees and Partners have a duty to report any suspected or actual incidents of bribery promptly. They should use the established reporting mechanisms, such as direct reports to supervisors, the internal reporting system, or the anonymous whistleblower hotline.
   - Reporting suspected bribery is a critical aspect of compliance, and Employees and Partners are assured of protection against retaliation for making reports in good faith.
4. **Cooperation with Investigations:**
   - Employees and Partners must cooperate fully with any investigations into bribery incidents. This includes providing accurate and complete information, participating in interviews, and assisting the investigation team as needed.
   - Cooperation with investigations is essential to ensuring that all allegations are thoroughly and fairly addressed.
5. **Continuous Improvement:**
   - Employees and Partners are encouraged to provide feedback on the Anti-Bribery Policy and related procedures. Their insights and experiences are valuable for identifying areas for improvement and enhancing the effectiveness of PY's anti-bribery measures.
   - They should also stay informed about any updates to the policy and participate in ongoing training and development opportunities.
6. **Ethical Conduct:**

- Employees and Partners are expected to uphold the highest standards of ethical conduct in all their professional activities. This includes acting with integrity, transparency, and accountability in all interactions and decisions.
- Ethical conduct is a fundamental aspect of PY's commitment to preventing bribery and corruption, and all Employees and Partners are responsible for contributing to a culture of integrity.

By understanding and adhering to the Anti-Bribery Policy, Employees and Partners ensure that PY's commitment to ethical behavior and bribery prevention is upheld across all levels of the organization. Their active participation and vigilance are essential to maintaining PY's reputation and integrity.

## 8. COMMUNICATION AND AWARENESS

Effective communication and awareness are critical to the successful implementation of PY's Anti-Bribery Policy. Ensuring that all Employees and Partners are well-informed about the policy and their responsibilities under it promotes a culture of integrity and compliance. PY has established comprehensive methods for policy distribution and ongoing awareness programs to achieve this goal.

**8.1 Policy Distribution**

PY is committed to ensuring that the Anti-Bribery Policy is accessible to all Employees and Partners. Clear and consistent communication of the policy is essential for fostering understanding and compliance.

**Methods for Disseminating the Policy to All Employees and Partners:**

1. **Initial Distribution:**
    - Upon joining PY, all new Employees and Partners receive a copy of the Anti-Bribery Policy as part of their onboarding package. This ensures that they are informed about the policy from the outset of their association with PY.
    - The onboarding process includes a detailed review of the policy, highlighting key provisions, responsibilities, and reporting mechanisms. New Employees and Partners are required to acknowledge their understanding and acceptance of the policy.
2. **Digital Accessibility:**
    - The Anti-Bribery Policy is made available on PY's intranet, providing easy and continuous access to all Employees and Partners. The intranet platform includes a dedicated section for compliance policies, where the Anti-Bribery Policy can be easily located and downloaded.
    - Digital copies of the policy are also distributed via email to ensure that all Employees and Partners have a readily accessible version on their devices.
3. **Printed Copies:**
    - For Employees and Partners who may not have regular access to digital platforms, printed copies of the Anti-Bribery Policy are made available. These copies can be requested from the Human Resources or Compliance departments.
    - Key locations within PY's offices, such as common areas, break rooms, and notice boards, display summaries of the policy and information on where to obtain full copies.
4. **Periodic Re-Distribution:**
    - PY re-distributes the Anti-Bribery Policy periodically to ensure ongoing awareness and to inform Employees and Partners of any updates or changes. This re-distribution is conducted annually or whenever significant amendments are made to the policy.
    - Re-distribution is accompanied by a communication campaign to highlight the importance of the policy and any new provisions or requirements.
5. **Mandatory Acknowledgment:**
    - All Employees and Partners are required to acknowledge receipt and understanding of the Anti-Bribery Policy. This acknowledgment is obtained upon initial distribution and during each periodic re-distribution.

    - Acknowledgment can be recorded digitally through the intranet or email, or in writing for those receiving printed copies. Records of acknowledgment are maintained by the Compliance team to ensure comprehensive coverage.

By implementing these methods for policy distribution, PY ensures that all Employees and Partners are well-informed about the Anti-Bribery Policy and have ready access to it at all times.

**8.2 Awareness Programs**
Ongoing awareness programs are essential for reinforcing PY's commitment to preventing bribery and ensuring that all Employees and Partners remain vigilant and informed. PY has established regular communication and awareness initiatives to promote understanding and compliance with the Anti-Bribery Policy.

**Regular Communication and Awareness Initiatives:**

1. **Training Programs:**
    - PY conducts regular training sessions on the Anti-Bribery Policy, ensuring that all Employees and Partners are knowledgeable about the policy's provisions and their responsibilities. Training programs are mandatory and cover key topics such as the definition of bribery, reporting mechanisms, and the consequences of violations.
    - Training is delivered through various formats, including in-person workshops, webinars, e-learning modules, and interactive sessions. This variety ensures that training is accessible and engaging for all participants.
2. **Awareness Campaigns:**
    - PY runs periodic awareness campaigns to highlight the importance of the Anti-Bribery Policy and to keep it top-of-mind for all Employees and Partners. These campaigns include posters, newsletters, email bulletins, and intranet updates.
    - Campaigns are designed to be informative and motivational, using real-life scenarios and case studies to illustrate the risks of bribery and the importance of ethical behavior.
3. **Leadership Communication:**
    - Senior management and the Board of Directors regularly communicate PY's commitment to ethical behavior and compliance with the Anti-Bribery Policy. These communications are delivered through town hall meetings, internal memos, and video messages.
    - Leadership communication reinforces the importance of the policy and demonstrates PY's commitment to maintaining a culture of integrity and accountability.
4. **Dedicated Compliance Resources:**
    - PY provides dedicated resources to support Employees and Partners in understanding and complying with the Anti-Bribery Policy. This includes access to a compliance team, an internal hotline for queries, and a comprehensive FAQ section on the intranet.
    - The compliance team is available to answer questions, provide guidance, and offer support on matters related to bribery prevention and policy compliance.
5. **Feedback Mechanisms:**

  - PY encourages Employees and Partners to provide feedback on the Anti-Bribery Policy and related awareness programs. Feedback can be submitted anonymously through the intranet or directly to the compliance team.
  - Regular surveys and feedback sessions are conducted to gather insights on the effectiveness of the policy and awareness initiatives, and to identify areas for improvement.
6. **Annual Anti-Bribery Week:**
  - PY designates an annual Anti-Bribery Week, during which various activities and events are organized to raise awareness about bribery prevention. Activities include guest speakers, panel discussions, workshops, and interactive sessions focused on ethical behavior and compliance.
  - Anti-Bribery Week serves as a dedicated time to reinforce the principles of the Anti-Bribery Policy and to engage Employees and Partners in discussions about maintaining a culture of integrity.
7. **Recognition and Rewards:**
  - PY recognizes and rewards Employees and Partners who demonstrate exemplary adherence to the Anti-Bribery Policy and ethical behavior. Recognition programs include awards, certificates, and public acknowledgment during meetings or events.
  - By celebrating ethical behavior, PY promotes a positive culture where integrity is valued and encouraged.
8. **Continuous Improvement:**
  - PY is committed to continuously improving its communication and awareness programs. This includes regularly reviewing and updating training materials, awareness campaigns, and communication strategies based on feedback and best practices.
  - PY stays informed about industry trends and developments in bribery prevention, ensuring that its programs remain relevant and effective.

By implementing these comprehensive communication and awareness initiatives, PY ensures that all Employees and Partners are continuously informed, engaged, and committed to upholding the Anti-Bribery Policy. These efforts contribute to a strong organizational culture of integrity and ethical behavior.

## 9. APPROVAL AND AMENDMENTS

Ensuring the legitimacy and effectiveness of Peace by Youth's (PY) Anti-Bribery Policy requires a formal approval and amendment process. This process guarantees that the policy is rigorously reviewed, appropriately authorized, and kept up-to-date with evolving best practices and legal requirements. The Board of Directors plays a crucial role in both the approval and amendment of the policy to maintain its integrity and relevance.

### 9.1 Approval Process

The initial approval of PY's Anti-Bribery Policy is a critical step in establishing its authority and ensuring organizational commitment. This process involves thorough review and formal endorsement by the Board of Directors.

**Documenting the Approval of the Policy by the Board of Directors:**

1. **Drafting and Preliminary Review:**
    - The initial draft of the Anti-Bribery Policy is prepared by PY's compliance team in collaboration with legal advisors and senior management. This draft is based on a comprehensive review of applicable laws, industry best practices, and PY's specific operational context.
    - Once the draft is completed, it undergoes a preliminary review by key stakeholders, including department heads, to gather feedback and ensure that all relevant perspectives are considered.
2. **Presentation to the Board of Directors:**
    - The finalized draft of the Anti-Bribery Policy is presented to the Board of Directors for review and approval. This presentation includes a detailed overview of the policy's provisions, the rationale behind its development, and the key responsibilities it outlines.
    - The compliance team provides a comprehensive briefing to the Board, highlighting the importance of the policy and how it aligns with PY's commitment to ethical conduct and compliance.
3. **Board Deliberation and Feedback:**
    - The Board of Directors reviews the policy in detail, deliberating on its content, clarity, and comprehensiveness. Board members have the opportunity to ask questions, seek clarifications, and provide feedback on the policy.
    - Any suggested modifications or enhancements proposed by the Board are documented and incorporated into the policy as necessary.
4. **Formal Approval:**
    - Upon thorough review and discussion, the Board of Directors formally approves the Anti-Bribery Policy. This approval is documented in the minutes of the Board meeting, indicating the date of approval and the names of the Board members present.
    - A resolution is passed by the Board, officially adopting the Anti-Bribery Policy as a governing document of PY. The resolution is signed by the Chair of the Board and the Secretary General, affirming the Board's endorsement.
5. **Communication of Approval:**
    - Following the Board's approval, the compliance team communicates the adoption of the Anti-Bribery Policy to all Employees and Partners. This communication includes an official announcement, distribution of the policy

document, and instructions for accessing the policy through PY's intranet and other channels.
  - The approval and the policy itself are also communicated through PY's internal communication platforms, ensuring that all stakeholders are aware of the new policy and its implications.

By documenting the approval process, PY ensures that the Anti-Bribery Policy is formally endorsed at the highest level of the organization, establishing its authority and underscoring the Board's commitment to ethical conduct and compliance.

**9.2 Amendment Procedures**
To ensure the Anti-Bribery Policy remains effective and responsive to changing circumstances, PY has established a structured process for making amendments to the policy. This process requires the involvement and approval of the Board of Directors to maintain the policy's integrity and alignment with PY's values.

**Process for Making Changes to the Policy, Requiring Board Approval:**

1. **Identifying the Need for Amendments:**
   - The need for amendments to the Anti-Bribery Policy may arise from various sources, including changes in laws and regulations, feedback from Employees and Partners, audit findings, and evolving industry best practices.
   - The compliance team continuously monitors these factors and identifies any necessary updates or improvements to the policy.
2. **Drafting Proposed Amendments:**
   - When amendments are deemed necessary, the compliance team, in collaboration with legal advisors and relevant stakeholders, drafts the proposed changes. These amendments are carefully crafted to address the identified needs while maintaining the policy's clarity and effectiveness.
   - The proposed amendments are documented in a clear and detailed manner, highlighting the specific sections of the policy to be updated and the rationale behind each change.
3. **Preliminary Review and Stakeholder Feedback:**
   - The draft amendments undergo a preliminary review by senior management and key stakeholders, including department heads and legal advisors. This review ensures that the proposed changes are practical, comprehensive, and aligned with PY's operational context.
   - Feedback from this review is incorporated into the final draft of the amendments, ensuring that all relevant perspectives are considered.
4. **Presentation to the Board of Directors:**
   - The finalized draft of the proposed amendments is presented to the Board of Directors for review and approval. This presentation includes a detailed explanation of the reasons for the amendments, the expected impact, and how the changes enhance the policy's effectiveness.
   - The compliance team provides a comprehensive briefing to the Board, highlighting the key amendments and their alignment with PY's commitment to preventing bribery and maintaining ethical standards.
5. **Board Deliberation and Approval:**
   - The Board of Directors reviews the proposed amendments in detail, deliberating on their content, clarity, and necessity. Board members have the

opportunity to ask questions, seek clarifications, and provide feedback on the amendments.
    - Upon thorough review and discussion, the Board formally approves the amendments. This approval is documented in the minutes of the Board meeting, indicating the date of approval and the names of the Board members present.
    - A resolution is passed by the Board, officially adopting the amendments to the Anti-Bribery Policy. The resolution is signed by the Chair of the Board and the Secretary General, affirming the Board's endorsement.
6. **Communication of Amendments:**
    - Following the Board's approval, the compliance team communicates the amended policy to all Employees and Partners. This communication includes an official announcement, distribution of the updated policy document, and instructions for accessing the amended policy through PY's intranet and other channels.
    - The amendments and the updated policy are also communicated through PY's internal communication platforms, ensuring that all stakeholders are aware of the changes and their implications.
7. **Training and Implementation:**
    - PY provides training sessions to ensure that all Employees and Partners understand the amended policy and its implications. These training sessions cover the specific changes, the reasons behind them, and how they impact day-to-day operations.
    - The compliance team monitors the implementation of the amended policy, ensuring that all Employees and Partners adhere to the updated provisions and that any issues are promptly addressed.
8. **Continuous Monitoring and Review:**
    - The compliance team continuously monitors the effectiveness of the amended policy and gathers feedback from Employees and Partners. Regular reviews and audits are conducted to ensure that the policy remains relevant and effective in preventing bribery.
    - Any further amendments that may be required based on monitoring and feedback are identified and addressed through the established amendment procedures.

By establishing a structured process for making amendments to the Anti-Bribery Policy, PY ensures that the policy remains up-to-date, effective, and aligned with the organization's values and commitment to ethical conduct. The involvement and approval of the Board of Directors in this process underscore the importance of the policy and ensure its integrity and legitimacy.

## 10. DOCUMENTATION AND RECORD-KEEPING

Effective documentation and record-keeping are crucial components of Peace by Youth's (PY) Anti-Bribery Policy. Proper records ensure transparency, accountability, and compliance, and they provide valuable data for continuous improvement. This section outlines the procedures for maintaining detailed records of reported bribery incidents and actions taken, as well as compliance documentation related to training, certifications, and audits.

### 10.1 Record of Incidents

Maintaining detailed records of all reported bribery incidents and the actions taken in response is essential for monitoring and managing bribery risks. These records provide a basis for analyzing trends, assessing the effectiveness of PY's anti-bribery measures, and ensuring accountability.

**Keeping Detailed Records of All Reported Bribery Incidents and Actions Taken:**

1. **Incident Reporting:**
    - All reported incidents of bribery are documented immediately upon receipt. Reports can be submitted through various channels, including direct reports to supervisors, the internal reporting system, the compliance team, or the anonymous whistleblower hotline.
    - The initial report must include all relevant details such as the date, time, location, and nature of the incident, as well as the names of the individuals involved and any evidence provided.
2. **Incident Register:**
    - PY maintains a comprehensive incident register that logs all reported bribery incidents. The register is managed by the compliance team and is kept up-to-date with new reports and ongoing investigations.
    - The incident register includes the following information for each reported incident:
        - **Incident ID:** A unique identifier assigned to each report.
        - **Date of Report:** The date the incident was reported.
        - **Reporter Information:** Details of the person reporting the incident (if not anonymous).
        - **Description of Incident:** A detailed description of the alleged bribery incident.
        - **Individuals Involved:** Names and roles of those implicated in the incident.
        - **Evidence:** A summary of the evidence provided or collected.
        - **Status:** The current status of the investigation (e.g., pending, under investigation, resolved).
        - **Outcome:** The final outcome of the investigation, including any disciplinary actions or corrective measures taken.
3. **Investigation Records:**
    - Detailed records of the investigation process are maintained for each reported incident. These records include all steps taken during the investigation, from initial assessment to final resolution.

    - Investigation records should document interviews conducted, evidence collected and analyzed, findings and conclusions, and any recommendations for corrective actions.
4. **Action Taken:**
    - For each reported incident, PY documents the actions taken in response. This includes disciplinary measures, policy updates, training sessions, and any other corrective actions implemented.
    - Records of actions taken are linked to the corresponding incident in the incident register, ensuring a complete and traceable history of the response.
5. **Confidentiality and Security:**
    - All records of reported bribery incidents and investigations are kept confidential and securely stored. Access to these records is restricted to authorized personnel within the compliance team and senior management.
    - Security measures, such as encryption and access controls, are implemented to protect the integrity and confidentiality of the records.
6. **Periodic Review and Analysis:**
    - The compliance team conducts periodic reviews and analysis of the incident register to identify trends, common issues, and areas for improvement. This analysis helps to inform PY's risk assessment and mitigation strategies.
    - Findings from the analysis are reported to senior management and the Board of Directors, along with recommendations for enhancing the Anti-Bribery Policy and related procedures.

By maintaining detailed records of all reported bribery incidents and actions taken, PY ensures transparency, accountability, and continuous improvement in its anti-bribery efforts.

**10.2 Compliance Documentation**
Maintaining comprehensive records of compliance-related activities is essential for demonstrating PY's commitment to preventing bribery and ensuring ongoing adherence to the Anti-Bribery Policy. These records include documentation of training programs, certifications, audits, and other compliance initiatives.

**Maintaining Records of Training, Certifications, and Audits:**
1. **Training Records:**
    - PY maintains detailed records of all training programs conducted on the Anti-Bribery Policy. These records include information on the content of the training, the dates of the sessions, and the participants.
    - Training records should include:
        - **Training Materials:** Copies of the training presentations, handouts, and any other materials used during the sessions.
        - **Attendance Lists:** Records of attendees, including their names, roles, and departments.
        - **Training Evaluations:** Feedback and evaluation forms completed by participants, providing insights into the effectiveness of the training.
2. **Certification Records:**
    - All Employees and Partners are required to certify their understanding and acceptance of the Anti-Bribery Policy. PY maintains records of these

certifications, including initial certifications upon joining and annual re-certifications.
  - Certification records should include:
    - **Certification Forms:** Signed forms or digital acknowledgments from Employees and Partners confirming their understanding and commitment to the policy.
    - **Certification Dates:** Dates when certifications were completed, ensuring that all personnel are re-certified annually or as required.

3. **Audit Records:**
   - PY conducts regular internal and external audits to review compliance with the Anti-Bribery Policy. Detailed records of these audits are maintained to provide a comprehensive view of compliance efforts and findings.
   - Audit records should include:
     - **Audit Plans:** Documentation of the scope, objectives, and timelines of the audits.
     - **Audit Reports:** Detailed reports of the audit findings, including identified issues, recommendations for corrective actions, and follow-up activities.
     - **Audit Logs:** Records of audit activities, including dates, audit team members, and key actions taken during the audit process.
4. **Risk Assessment Records:**
   - PY conducts periodic risk assessments to identify and evaluate bribery risks. Records of these assessments are maintained to track risk management efforts and to support continuous improvement.
   - Risk assessment records should include:
     - **Risk Assessment Reports:** Documentation of the identified risks, their potential impact, and the mitigation strategies implemented.
     - **Follow-Up Actions:** Records of actions taken to address identified risks, including updates to policies and procedures.
5. **Compliance Reports:**
   - Regular compliance reports are prepared to provide an overview of PY's anti-bribery efforts and to track progress against key performance indicators. These reports are used to inform senior management and the Board of Directors.
   - Compliance reports should include:
     - **Summary of Activities:** A summary of compliance-related activities, including training sessions, audits, and incident investigations.
     - **Performance Metrics:** Key performance indicators and metrics used to measure the effectiveness of the Anti-Bribery Policy.
     - **Recommendations:** Recommendations for enhancing compliance efforts and addressing any identified issues.
6. **Document Retention:**
   - All compliance documentation is retained in accordance with PY's document retention policy. This ensures that records are available for reference and review for an appropriate period, typically in compliance with legal and regulatory requirements.
   - Retention periods and procedures for archiving and disposing of records are clearly defined and communicated to all relevant personnel.
7. **Confidentiality and Security:**

    - Compliance documentation is maintained with the highest standards of confidentiality and security. Access to these records is restricted to authorized personnel, and appropriate security measures are implemented to protect the integrity and confidentiality of the information.
    - Electronic records are securely stored using encryption and access controls, while physical records are kept in secure storage areas with controlled access.
8. **Regular Review and Update:**
    - The compliance team regularly reviews compliance documentation to ensure accuracy, completeness, and relevance. This includes updating records as necessary to reflect changes in policies, procedures, or personnel.
    - Feedback from audits, training evaluations, and other compliance activities is used to continuously improve the documentation process and to ensure that records provide an accurate and comprehensive view of PY's anti-bribery efforts.

By maintaining comprehensive records of training, certifications, audits, and other compliance activities, PY demonstrates its commitment to preventing bribery and ensures ongoing adherence to the Anti-Bribery Policy. Proper documentation supports transparency, accountability, and continuous improvement in PY's anti-bribery efforts.

# 11. POLICY REVIEW

Regular review and feedback mechanisms are essential to ensuring that Peace by Youth's (PY) Anti-Bribery Policy remains relevant, effective, and responsive to changing circumstances. This section outlines the procedures for the regular review of the policy and the mechanisms in place for Employees and Partners to provide feedback.

### 11.1 Regular Review Cycle

To maintain the effectiveness and relevance of the Anti-Bribery Policy, PY has established a regular review cycle. This cycle ensures that the policy is periodically evaluated and updated to reflect new legal requirements, industry best practices, and lessons learned from its implementation.

**Schedule for Periodic Review of the Policy to Ensure Relevance and Effectiveness:**

1. **Annual Review:**
    - The Anti-Bribery Policy is reviewed annually by the compliance team in collaboration with the legal department, senior management, and other relevant stakeholders. The annual review ensures that the policy remains aligned with current laws, regulations, and best practices.
    - The review process includes an assessment of the policy's effectiveness based on compliance reports, audit findings, incident records, and feedback from Employees and Partners.
2. **Mid-Year Check-In:**
    - In addition to the annual review, a mid-year check-in is conducted to address any immediate issues or changes that may arise. This check-in allows for timely updates to the policy in response to emerging risks or significant incidents.
    - The mid-year check-in involves a brief review of the policy's implementation and effectiveness, focusing on any areas that may require immediate attention.
3. **Trigger-Based Reviews:**
    - Trigger-based reviews are conducted in response to specific events or changes that may impact the Anti-Bribery Policy. Such triggers include significant legal or regulatory changes, major bribery incidents, or findings from internal or external audits.
    - The compliance team monitors for such triggers and initiates a review as needed to ensure that the policy remains relevant and effective.
4. **Documentation and Reporting:**
    - The results of each review are documented in a review report, which includes a summary of findings, recommended changes, and an implementation plan for any updates. The review report is presented to senior management and the Board of Directors for approval.
    - Once approved, the updated policy is communicated to all Employees and Partners, ensuring that they are informed of any changes and their implications.
5. **Stakeholder Involvement:**
    - The review process involves input from various stakeholders, including department heads, compliance officers, legal advisors, and representatives

   - from different operational areas. This collaborative approach ensures that the policy review is comprehensive and considers diverse perspectives.
   - Stakeholders are invited to provide feedback and suggestions during the review process, which are considered in the final recommendations for policy updates.

By establishing a regular review cycle, PY ensures that its Anti-Bribery Policy is consistently evaluated and updated to maintain its relevance and effectiveness in preventing bribery and promoting ethical conduct.

**11.2 Feedback Mechanism**
An effective feedback mechanism is crucial for continuously improving the Anti-Bribery Policy. PY has established processes for Employees and Partners to provide feedback on the policy, ensuring that it reflects their experiences, insights, and suggestions.

**Process for Employees and Partners to Provide Feedback on the Policy:**

1. **Feedback Channels:**
   - PY provides multiple channels for Employees and Partners to submit feedback on the Anti-Bribery Policy. These channels include an online feedback form accessible through the intranet, a dedicated email address for compliance-related queries, and regular feedback sessions.
   - The online feedback form is designed to be user-friendly and allows for anonymous submissions to encourage honest and open feedback.
2. **Regular Feedback Sessions:**
   - Regular feedback sessions are organized as part of training programs, team meetings, and compliance workshops. These sessions provide an opportunity for Employees and Partners to discuss the policy, share their experiences, and suggest improvements.
   - Feedback sessions are facilitated by the compliance team and include discussions on recent updates, challenges faced in implementing the policy, and areas for improvement.
3. **Anonymous Feedback Mechanism:**
   - To ensure that Employees and Partners feel comfortable providing candid feedback, PY has established an anonymous feedback mechanism. This mechanism allows individuals to submit their comments and suggestions without revealing their identity.
   - Anonymous feedback can be submitted through the whistleblower hotline or the online feedback form, both of which ensure confidentiality.
4. **Feedback Review and Analysis:**
   - The compliance team regularly reviews and analyzes the feedback received from Employees and Partners. This analysis helps identify common themes, areas of concern, and opportunities for enhancing the policy.
   - Feedback is categorized and prioritized based on its relevance and potential impact on the policy's effectiveness.
5. **Incorporating Feedback into Policy Updates:**
   - Relevant feedback is incorporated into the regular review and update process of the Anti-Bribery Policy. The compliance team ensures that suggestions for improvement are considered and, where appropriate, integrated into the policy.

    - Significant changes resulting from feedback are communicated to all Employees and Partners, highlighting the importance of their input and how it has contributed to the policy's enhancement.
6. **Continuous Improvement:**
    - PY is committed to continuously improving its Anti-Bribery Policy based on feedback from Employees and Partners. This commitment includes regularly evaluating the feedback process itself to ensure it remains effective and accessible.
    - The compliance team seeks to create a culture where feedback is valued and actively used to enhance PY's anti-bribery measures and overall ethical standards.

By providing a structured and accessible feedback mechanism, PY ensures that its Anti-Bribery Policy is informed by the experiences and insights of its Employees and Partners. This approach fosters a culture of continuous improvement and helps maintain the policy's effectiveness and relevance.

## APPROVED POLICY

This policy was approved by Peace by Youth – PY Board of Directors on ________________.
This policy may only be amended or changed with the approval of Board of Directors.

________________________________________ Dated: __/__/2022

Secretary General – Peace by Youth – PY