 IISD International Institute for Sustainable Development COMPANY POLICY	Policy Number Pol/01/202005		Approved By: Richard Florizone
	Title IISD Anti-Bribery and Corruption Policy		
Division IISD, IISD Europe & ELA	Department Human Resources	Revision Revised V.2 Sept 11, 2022	Distribution IISD, IISD Europe & ELA
Written By Human Resources	Reviewed By Senior Management Committee		

IISD Anti-Bribery and Corruption Policy

Purpose

IISD wishes to support national and international governments and organizations that aim to eliminate corruption in all spheres.

As such, IISD hopes to educate employees and stakeholders on relevant regimes and stay abreast of the evolving anti-corruption landscape while attempting to comply with all regimes where practical. This is given that IISD has limited resources and typically not large presences on the ground in foreign states.


Persons Affected

President and CEO, Employees, Board Members, Consultants

Policy

IISD will work against corruption in all its forms, including bribery. Where IISD action is not covered in another policy, it is the affected person's responsibility to disclose, in as much detail as possible, any actual or perceived corruption in business activities with or by our partners, consultants, or service providers to the Managing Director.

Where personal safety is not at risk, an affected person has the right to suspend the partner, business, or service provider relationship with IISD until a suitable decision is reached on the relationship by the Executive Group of IISD.

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Definitions

From Transparency International:

[Corruption is defined] Generally speaking as “the abuse of entrusted power for private gain”. Corruption can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.

Grand corruption consists of acts committed at a high level of government that distort policies or the central functioning of the state, enabling leaders to benefit at the expense of the public good. Petty corruption refers to everyday abuse of entrusted power by low- and mid-level public officials in their interactions with ordinary citizens, who often are trying to access basic goods or services in places like hospitals, schools, police departments and other agencies.

Political corruption is a manipulation of policies, institutions and rules of procedure in the allocation of resources and financing by political decision makers, who abuse their position to sustain their power, status and wealth.


Responsibilities

The President and CEO is responsible for ensuring compliance with the policy. This includes reviewing the policy on an annual basis for potential revision.

Procedures

The President and CEO will accept all claims of violation of this policy in any form.

The President and CEO shall compile a written brief from any affected person’s submission for initial presentation to the Executive Group. The President and CEO shall also be responsible for carrying out the actions resulting from the Executive Group decision, including informing any law enforcement agency or the direct partner, business, or service provider whose relationship will end.

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In situations where the affected person prefers to place an **anonymous** report in confidence, they are encouraged to use the Ethics hotline, EthicsPoint, hosted by a third-party hotline provider, NavEx Global.

The affected person may use any of the following methods to submit a report:

1. Select the “**Make a Report**” link on the [EthicsPoint web page](#). The web page is hosted on a third-party server and therefore is completely confidential.
2. Dial toll-free, within the United States, Canada and Switzerland:
Toll-free Hotline Number:
Canada & US: 1-(844) 955-1643
Switzerland: From an outside line, dial 0-800-890011 then at the prompt dial (844) 955-1643
3. Use the [NavEx mobile app](#).


Confidentiality

Confidentiality is assumed unless you agree that your identity may be revealed. Any and all information collected under this policy or through the investigative process will be held in confidence, except where disclosure may be necessary to further the investigation or as required by law.

Approved By:



Richard Florizone
President and CEO
IISD

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Revision History

Revision #	What was changed	Why was it changed	Date/Approved By
1	Jane McDonald (Managing Director) was replaced by Richard Florizone (President and CEO in Procedures and Persons Affected). The reporting process related to the Ethics hotline was added.	Richard Florizone is the new President and CEO of IISD. IISD collaborated with NavEx Global and introduced a third-party ethics hotline to report anonymously. This ethics hotline is available for internal and external stakeholders.	July 21, 2020
2	The word 'Regime' was changed to governments and organizations A confidentiality clause was added to the policy.	More specific terms were used to describe whom IISD will support to eliminate corruption. The clause was missing before. Now, the policy is consistent with the other policies.	September 11, 2022