



## VIDEA - Anti-Corruption Policy

VIDEA is committed to ending global poverty and creating a more just and equitable world. We live in a world where extreme poverty and a lack of access to education, health care, a clean environment, gender equality, human rights and economic opportunities are a reality for many. The challenges of poverty are exacerbated by corruption, a fundamental issue that afflicts the everyday lives of the very poorest and thwarts global efforts to lift countries out of poverty.

Not only does corruption affect economic development in terms of economic efficiency and growth, it also affects equitable distribution of resources across the population, increasing income inequalities, undermining the effectiveness of gender equality and social welfare programmes, and ultimately resulting in lower levels of human development. This, in turn, may undermine long-term sustainable development, economic growth and equality.

VIDEA is committed to complying with the anti-corruption laws in all countries in which it operates. This includes, but is not limited to, laws in Canada, and international laws such as anti-corruption laws enacted in each country where VIDEA works or employs partner organisations. VIDEA will actively and closely monitor the adherence of all of its employees, volunteers and partners with whom they conduct business. VIDEA will also continue to address ethical and legal obligations in countries outside Canada which are subject to anti-corruption laws.

### Anti-Corruption Policy

All VIDEA board members and volunteers, must not make, offer to make, or promise to make payments (regardless of whether the payment is actually made) or give anything of value directly or indirectly to any third party, including any Government Official and/or public service provider, to assist VIDEA in obtaining or retaining an improper business advantage, whether or not any benefit is received. Prohibited payments include:

- Payments securing an improper advantage, including a decision to select VIDEA to provide any services, or to provide VIDEA with more preferential terms that may provide VIDEA an improper advantage;

- Improper gifts, hospitality or other non-monetary items provided to any Government Official and/or other public service provider that do not comply with the anti-corruption policy
- Payments to influence any act or decision of a Government Official in his or her official capacity;
- Payments to influence the Government Official to abuse his or her power for private gain;
- Payments to induce a Government Official to perform or fail to perform any act;
- Payments inducing a Government Official to use his or her influence with a government or government instrumentality to affect or influence any act or decision of a government or instrumentality;
- Any facilitation payments made without the approval of the Finance Committee;
- Any gifts or entertainment provided to any regulatory, customs, or otherwise similarly situated Government Official;
- Any travel expenses of any regulatory, customs, or otherwise similarly situated Government Official; unless expressly preapproved by the Board of Directors for legitimate business purposes; and
- Any political contribution by VIDEA.

### **Reporting Responsibility:**

Employees or volunteers have a responsibility to report any conduct that they believe may violate this Policy. They may report such conduct to any one of the VIDEA Board Members. Reports of violations must be reported in writing. All such reports will be treated as confidential and be used only for the purpose of addressing the specific problem reported. Such reports will be shared by VIDEA board members and other authorized individuals only on a need-to-know basis. Unless acting in bad faith, VIDEA employees and volunteers will not be subject to reprisals for reporting information about potential violations.

### **Auditing and Monitoring:**

VIDEA will periodically audit and monitor compliance with this Policy through scheduled, as well as random, anti-corruption compliance assessments and other monitoring initiatives employed by the Board of Directors or other third parties engaged by VIDEA. All VIDEA employees and volunteers are required to attend an induction workshop that includes an introduction to VIDEA's anti-corruption policy.

### **Penalties and Consequences:**

Each VIDEA employee or volunteer is responsible and accountable for adhering to this Policy. Violations of this Policy can result in criminal and civil exposure for VIDEA and each VIDEA employee or volunteer involved, including imprisonment and other severe penalties. In addition to penalties that may be imposed by the laws of the countries where we operate, violations of this Policy may be punished with discipline, up to and including termination, of the VIDEA employee or volunteer and referral for prosecution.