



OUR POLICIES

Approved by: Lille Fro Foundation, Board

Date: 13 September 2024

ANTI-CORRUPTION POLICY

At Lille Fro Foundation (ABN 38 135 501 521) (**Lille Fro**), the way we do things is just as important as what we do. Of course, we want to be leaders in our industry... but not at any price.

We want to create an organisation where each employee, volunteer, director, office holder, agent, contractor, affiliate, partner or representative of Lille Fro (**Lille Fro Representative**) achieves the highest business and personal standards, and where everyone feels proud to be part of our global organisation and work.

Lille Fro is a team with core values: Accountability, integrity, honesty and transparency. These values guide how we work every day. We bring these values to life in the way we perform, giving our best effort every day, being accountable for what we do, delivering on our commitments to each other and to our donors, partners and beneficiaries, setting objectives, meeting our goals, and working together to achieve results. A core objective of our organisation is creating an open, honest and inclusive culture that drives transparency and positive outcomes. A culture which also has a zero tolerance approach to corruption.

As a Lille Fro Representative, you are representing the organisation to our donors, partners and everyone else you come into contact with. As laid out in our Code of Conduct (**COC**) you are expected to adopt the highest standards of professional and personal behaviour and demonstrate Respect, Integrity, Good judgment, Honesty and Trust, the RIGHT Way, in all your actions, no matter what the circumstances.

One of the guiding principles of the COC is 'complying with anti-corruptions laws'. This Anti-Corruption Policy extends on this principle, and is applicable to all Lille Fro Representatives and everyone we do business with, including agents, suppliers, representatives, our in-country partners, consultants, independent contractors and anyone acting on behalf of Lille Fro.

If you have any questions regarding Lille Fro's Anti-Corruption Policy, please write to us at teamfro@lillefro.org.

Purpose of the Anti-Corruption Policy

This policy outlines acceptable and non-acceptable behaviours to ensure compliance with internationally adopted anti-corruption laws, such as the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. This includes compliance with all other applicable laws, whether domestic (including India) or foreign laws, prohibiting the improper payments, gifts or inducements of any kind to and received from any person, including officials in the private or public sector, customers and suppliers (**Anti-Corruption Laws**).

Helpful Definitions

Bribe: Anything of value given in an attempt to affect a person's actions or decisions in order or to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesies.

Corruption: The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Facilitation payments: Small sums paid to government officials to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.

Kickbacks: The return of a sum already paid or due as a reward for awarding of furthering business.

What Does 'Anti-Corruption' Mean to You?

Corruption can take place in many types of activities. It usually is designed to obtain financial benefits or other personal gain. For example, bribes are intended to influence behaviour – they could be in the form of money, a privilege, an object of value, an advantage, or merely a promise to influence a person in an official or public capacity. Usually, two people are involved and both will benefit.

Examples of a bribe include:

- Offer or receipt of cash in the form of a kickback, loan, fee or reward
- Giving of aid, donations or voting designed to exert improper influence

The areas of business where corruption, including bribery, can most often occur include:

1. Gifts, Entertainment and Hospitality
2. Facilitation Payments
3. Procurement Process
4. Political, Community and Charitable Contributions

1. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality are acceptable if they are reasonable, proportionate and made in good faith and in compliance with our policies. These activities must be in compliance with our Code of Conduct, Conflict of Interest Policies and other policies and guidelines advised from time to time. Although no two situations are the same, if in doubt please contact Lille Fro's legal department for confirmation as to what is and what is not acceptable.

Examples of gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, invitations to events, functions, or other social gatherings, in connection with matters related to our business. These activities are acceptable provided they fall within reasonable bounds of value and occurrence.

How do you know if an offered gift, entertainment or hospitality by Lille Fro or to Lille Fro is acceptable? First, take a step back and ask yourself the following:

- What is the intent – is it to build a relationship or is it something else?
- How would it look if these details were on the front of a newspaper?

- What if the situation were reversed – would there be a double standard?

If you find it difficult to provide a comfortable answer to one of the above questions, ASK your manager or the legal department.

What to do when you doubt if you can accept? If you are unsure if you should accept something of value – ASK. Ask your manager or the legal department. If your manager is participating, seek a higher-level manager or ask Lille Fro's legal department.

As a general rule, Lille Fro Representatives should not provide gifts or hospitality to, or receive them from, a government or other public official (or their close families and business associates). You may give a modest gift to these parties when appropriate and allowed by local law provided you discussed it with and received written approval in advance from the legal department.

2. Facilitation Payments

Facilitation payments are not allowed. If you are unsure whether certain payments represent facilitation payments, please contact your local Legal Officer, or the Ethics and Compliance Office.

3. Procurement Process

You must follow Lille Fro processes and adhere to the system of internal controls around partner and supplier selection. Supplier selection should never be based on receipt of a gift, hospitality or payment. When supplier selection is a formal, structured invitation for the supply of products or services (often called a 'tender'), it is most important we maintain documentation supporting our internal controls. In the public sector, such a tender process may be required and determined in detail by law to ensure that such competition for the use of public money is open, fair and free from corruption.

A tender process includes an invitation for other parties to make a proposal, on the understanding that any competition for the relevant contract must be conducted in response to the tender, no parties having the unfair advantage of separate, prior, closed-door negotiations for the contract where a bidding process is open to all qualified bidders and where the sealed bids are in the open for scrutiny and are chosen on the basis of price and quality.

4. Political, Religious, Community and Charitable Contributions

Lille Fro is a non-political and non-religious organization and is not permitted to make political contributions or make contributions to religious entities. As such, you are not allowed to make political contributions or make payments to any religious entity or group from charity funds under any circumstances.

Contributions made by Lille Fro to community and development projects or charities must be made in good faith and in compliance with Lille Fro's Code of Conduct, constitution, this Anti-Corruption Policy and all other relevant Lille Fro policies and procedures having regard to the objectives of the organization at all times.

Books, Records and Internal Control Requirements

Expenses must never be hidden or purposefully misclassified. Many serious global bribery and corruption scenarios are found to involve inaccurate record-keeping. To prevent this, Anti-Corruption Laws generally require detailed and accurate accounting records for transactions, including cash and bank accounts. We must ensure we maintain accurate books, records and financial reporting.

All business units must maintain an effective system of internal control and monitoring of our transactions. Certain monitoring controls are identified in our policies, specifically regarding approval of travel and entertainment expenses. It is your responsibility to be knowledgeable of control procedures and ensure compliance.

You Are Responsible

Lille Fro takes corruption and bribery very seriously. Any violation of this policy or Anti-Corruption Laws will be regarded as a serious matter by the organisation and is likely to result in disciplinary action, including termination, consistent with local law.

Bribery is a criminal offence. As a Lille Fro Representative you will be personally accountable whether you pay a bribe yourself or whether you authorize, assist, or conspire with someone else to violate an Anti-Corruption Law or anti-bribery law.

Punishment for violating the law as an individual and may include imprisonment, probation, mandated community service and significant monetary fines which will not be paid by Lille Fro and for which Lille Fro is not responsible.

Further, as a Lille Fro Representative, you agreed to indemnify Lille Fro against any action, claim, loss, cost, proceeding or event caused or contributed to in any way by your failure to comply with any Anti-Corruption Law.

Questions or How to Raise a Concern

If you want to ask a question about the requirements in this policy or are concerned that an anti-corruption violation is occurring or has occurred, report it immediately to teamfro@lillefro.org.

In the US and the Netherlands, you are required by law to report any suspected violation and failing to do so is itself a breach of our COC.

Policy Ownership

The Board is responsible for implementation and review of this Policy.

This policy applies to all Lille Fro Representatives including any board members, office holders, directors, volunteers and employees of Lille Fro Foundation (Australia), Lille Fro India, any partners, subsidiaries, beneficiaries, agents, suppliers, representatives, our in-country partners and everyone we do business with including consultants, independent contractors, suppliers unless otherwise specified or as required by Federal, National, Country, State or Local law or Collective Bargaining Agreement.

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Review of policy

This policy will be reviewed every 3 years.

