

Anti-bribery and Corruption Policy

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Approved by:	Greenpeace Nordic Board of Directors
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For:	Greenpeace Nordic
Responsible for monitoring/Ownership:	Executive Director
Responsible body:	Greenpeace Nordic Board of Directors

Objective

This policy codifies our intolerance of bribery and corruption.

Applicability

This policy applies to all Greenpeace Nordic (GPN) people¹ and extends to activities and transactions in all countries in which GPN operates permanently, periodically and occasionally.

The policy also applies to our third-party agents and representatives, engaged either formally or informally, to facilitate GPN's access to goods, services, information and other operational needs.

Non-adherence to this policy will lead to disciplinary action.

Our values

GPN is committed to transparency and accountability, which are fundamental values of our organisation and crucial to ensuring the highest standards in our work, the same standards that we demand of the world's governments and industries. Accordingly, we aim to always conduct our operations to the highest ethical standards.

GPN is also committed to social transformation directed towards meeting the basic human right to a healthy environment, and we challenge the abuse of power which results in the poor and the disenfranchised suffering the effects of environmental damage caused by the greed or corruption of others.

Corruption eats at the very heart of this by diverting resources away from public services, lowering their quality and often restricting access to essential services such as water, health and education. Amongst other serious consequences such as poverty, human rights abuses, and threats to health and safety, it diverts resources away from environmental protection and enforcement of environmental regulations. This creates opportunity for producers and consumers to evade environmental laws and regulations, and their responsibility for the damage they cause.

¹ "People" are defined as all Board members, salaried staff, interns, volunteers and freelancers/contractors under the direction of (deployed by) GPN. This definition also extends to Board members, staff, interns, volunteers and freelancers/contractors from other Greenpeace offices if they are engaged in an activity that places them under the direction of Greenpeace Nordic.

Our Policy

Under no circumstances will GPN or its people, directly or indirectly, knowingly participate in corruption or acts or activities that contribute to or are the result of corruption. We advocate the United Nations Convention against Corruption², and will comply with all relevant national and European Union laws and regulations³.

Corruption is defined as the abuse of entrusted power for private gain. It takes many forms and includes bribery, conflict of interest, embezzlement, trading in influence and money laundering.

In spite of being illegal in most countries, corruption can pervade high levels of a government, leading to a broad erosion of confidence in good governance, the rule of law and economic stability. It also exists in the private sector, and in some countries these boundaries are blurred as business people and politicians are often one and the same. Corruption distorts the central functioning of the state. It is the manipulation of policies, institutions and rules of procedure in the allocation of resources and financing by political leaders and decision makers who abuse their position to advance their power, status and wealth for personal and political gain, at the expense of the public good.

Bribery is the 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. These officials can take decisions or actions on behalf of others by virtue of their authority or position, and are influenced by receiving or by being offered inducements for them to take or refrain from taking an action or decision which they would not have done otherwise, said action or decision being illegal, unethical or a breach of trust. Inducements can involve the exchange of, or promise of, money or other gifts, loans, fees, inside information, sexual or other favours, rewards, entertainment, employment, or other advantages.

All forms of corruption and bribery are unethical, detrimental, and unacceptable to GPN.

Below we detail our policies for the most prevalent forms of corruption likely to be encountered by GPN:

Facilitation Payments

Facilitation payments, also called a speed, baksheesh or grease payments, are small payments made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement. Examples could include mail pickup and delivery, providing telephone services and power and water supplies, clearing into and out of ports and international borders, importing and exporting equipment, and scheduling mandatory inspections by building or fire inspectors.

Facilitation payments are a form of corruption and are not acceptable to GPN.

GPN recognises that, in exceptional circumstances, payments may be unavoidable without perceived risk to life or limb. Under these conditions facilitation payments may be made. These payments should be negotiated to a minimum amount, with a receipt indicating the amount of the payment, the reason for the payment, the name of the officer who requested it, and his or her position, preferably signed by the official.

All facilitation payments, regardless of circumstances, must be recorded and submitted to the Executive Director with a report detailing the events that led to the making of the payments.

If facilitation payments are made as a result of negligence, for example by travelling with incorrect documentation, the payee may at the discretion of the Executive Director be subject to disciplinary procedures.

Extortion

Extortion is an act of utilising, either directly or indirectly, one's access to a position of power or knowledge to demand unmerited cooperation or compensation as a result of coercive threats, either overt or covert.

² http://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf

³ <http://www.u4.no/pdf/?file=/themes/private-sector/documents/netherlands-action-plan.pdf>; <http://polis.osce.org/library/f/2681/496/CoE-FRA-RPT-2681-EN-Council%20of%20Europe%20Criminal%20Law%20Convention%20on%20Corruption.pdf>

While GPN does not condone improper payments of money or goods made under duress, we recognise that our people sometimes operate in dangerous or unstable regions. In these circumstances customary (commonly practiced, used, or encountered) payments may be made to ensure personal well-being. An example of this would be payment of money or goods to militia to cross through a road block.

These payments should be negotiated to a minimum amount, with a receipt indicating the amount of the payment, the reason for the payment, the name of the officer who requested it, and his or her position, preferably signed by the official.

All extortion payments, regardless of circumstances, must be recorded and submitted to the Executive Director along with a report detailing the events that led to the making of the payments.

Gifts

In certain situations it may be customary or desirable to give or accept a gift. A gift is something of reasonable value given without the expectation of return; a bribe is the same thing given in the hope of influence or benefit. Therefore, any gift given or received with an expectation of compensation crosses the line into bribery.

Before any of our people give or accept a gift, they must measure it against this acronym: **G**enuine (offered in appreciation for legitimate functions without encouragement), **I**ndependent (no effect on future functioning), **F**ree (without obligations) and **T**ransparent (declared openly). If the proposed gift does not meet all of these descriptions it is not a gift – it is a bribe.

Note that particular care must be taken where gifts are given to public officials. This may be illegal under some countries' laws.

Implementation procedures

- All current and future GPN staff and volunteers made aware of this policy.
- All violations of this policy reported to the Executive Director's Office, or to the Chair of the Board in the case of whistle blowing (see Whistle Blower Policy).
- Officers, managers and supervisors made responsible for ensuring the procedures are fully implemented within their areas of responsibility.

Revision history

New policy.

This policy will be reviewed every five years