**Anti-Corruption**

*Sample Policy*

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| **Instructions:**Below you can find a sample anti-corruption policy. If you decide to use it as a template for your own policy, fill it out with your own business information and be sure to align the policy as much as possible with your organisational structure and processes. |

**[NAME OF BUSINESS]** is committed to conducting business with integrity and in compliance with all applicable laws and regulations.

The purpose of this Anti-Corruption Policy, in particular, is to declare that **[NAME OF BUSINESS]** adopts a zero tolerance approach when it comes to corruption. **[NAME OF BUSINESS]** does not, and will not, pay bribes or offer improper incentives to any individual, business, charitable organisation or political party for any purpose. Nor do we, or will we, accept bribes or improper incentives or anything that could be perceived as such.

Aware of the fact that corruption, especially in the forms of bribery and facilitation payments, is a concern for businesses of all types and sizes in the gemstones and jewellery industry, **[NAME OF BUSINESS]** implements an anti-corruption system, reflected in our **[ANTI-CORRUPTION PROCEDURE]**, which provides a framework for **[NAME OF BUSINESS]**’sfight against corruption within our business and throughout our value chain.

**[NAME OF BUSINESS]** requires executives, management and employees to be familiar with their legal responsibilities and adhere to this Policy and related procedures. Violations of anti-corruption laws can lead to severe legal penalties, and all of **[NAME OF BUSINESS]’s** employees are aware of this reality.

Employees who violate this Policy, the accompanying Procedure or any other aspect of [**NAME OF BUSINESS]’s** Anti-Corruption system are subject to disciplinary action, up to and including dismissal and may also be subject to individual criminal and/or civil prosecution in relevant jurisdictions.

**[NAME OF BUSINESS]** expects the same from our customers, suppliers, and other business partners.

**[NAME OF BUSINESS]** reserves the right to suspend any client, business partner or counterparty’s operation, which can be regarded as illegal or may be deemed corrupt.

**[NAME OF BUSINESS]** Anti-Corruption Policy is based on the following principles:

* Zero tolerance: All forms of bribery and corruption, including facilitation payments, are strictly prohibited.
* Gifts: Gifts must always be proportionate and reasonable; must have a legitimate purpose; and must not create a conflict of interest or the perception thereof. Expenses and payments related to third parties should be registered and accurately recorded in the gift register

Public Officials: Legitimate business interactions with public officials or state-owned entities are subject to heightened attention and stricter conditions, such as pre-approvals and lower limits.

* Charitable contributions: Charitable contributions should only be made to bona fide charities so they cannot be used to conceal a bribe.
* Political contributions: Management, employees, and representatives of [NAME OF BUSINESS] may not make gifts or donations without previous approval and in any case where such contribution is intended to lead do a business advantage.
* Violations: Questionable behaviour should be challenged and (suspected) improper payments or activities should be reported to management or via the whistleblowing mechanism. We do not penalise or punish employees for identifying in good faith concerns related to suspected bribery, for refusing to participate in bribery, or refusing to pay a facilitation payment where Facilitation Payments are prohibited.

We routinely assess which business activities are most susceptible to corruption and train our managers and employees to respond appropriately.

This policy will be reviewed and updated on a regular basis to account for both changes in applicable regulations and changes in our business.

Date:

Signature:

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