

# STOPPING BRIBERY IN THE WORKPLACE

## A Guide to Understanding Mercy Corps' Anti-Bribery Policy

This document provides additional guidance around Mercy Corps' policy concerning bribery in the workplace. This guide is not a replacement for the stated policy but instead highlights key issues that team members may encounter in their roles and steps to seeking assistance.

Mercy Corps is committed to a work environment in which everyone acts with the highest level of ethical conduct. Our organization will not tolerate bribery by or of its team members.



View the Anti-Bribery policy in the Digital Library.



View the eLearning course in Talent Development at [Talent.MercyCorps.org](https://Talent.MercyCorps.org)



Everyone has the right and obligation, per Mercy Corps' policy, to tell someone about possible fraud or corruption. If you hear about or are aware of such actions, you should **report** this to your **supervisor**, a **trusted leader** or the **Integrity Hotline**. You may choose to remain anonymous with the Integrity Hotline.



Remember if you see or hear about bribery payments or an attempt, help address the problem by reporting so that everyone can have an ethical working environment and ensure that resources go to those we are there to help. As a reporter, witness and/or victim, **your role is not to investigate**; that will be done through an established confidential process.



Regardless of cultural practices or social norms, **Mercy Corps will not tolerate bribery as defined in the policy.**



There are various reasons why someone might be hesitant to speak out or seek assistance if they see or hear about bribery. These reasons might include fear of retaliation, of not being believed, or not being taken seriously. **Know that Mercy Corps will take all allegations seriously. Retaliation will not be tolerated for reports made in good faith, even if not substantiated.**



It is important for everyone to respect the seriousness of these types of allegations. If a team member tells you about suspected bribery payments, **LISTEN** and **ASSIST** them with reporting.

### THE FOLLOWING KEY TERMS ARE IMPORTANT TO UNDERSTAND:



**Corruption** includes any act of fraud, theft, embezzlement, or bribery.

**Bribery** is money or favor given/received or promised in order to influence the judgment or conduct of another person.

**Kickbacks** are illegal payments made to someone who has improperly assisted with an appointment or event.

**Facilitation Payments** are payments made to expedite or secure the performance of a routine action.



### REMEMBER!

[mercycorps.org/integrityhotline](https://mercycorps.org/integrityhotline)  
or  
[integrityhotline@mercycorps.org](mailto:integrityhotline@mercycorps.org)



# Policy Talk

## QUESTIONS

Do I have to give my name when making a report about possible bribery?

## ...AND ANSWERS

Mercy Corps accepts **anonymous reports** through the **Integrity Hotline**.

I heard about a vendor who offered money to a procurement officer in order to get inside information about an upcoming tender. Is this bribery?

**Yes, this is bribery.** A bribe is any payment given or offered in order to influence the outcome of a transaction.

Would it be considered a bribe if a procurement officer contacted a vendor and offered to help them in winning a bid in exchange for the vendor sharing his profit?

**Yes, this action would violate Mercy Corps' policy of ethical, fair, and transparent transactions.** This would be called a kickback which is considered a form of bribe.

As long as Mercy Corps gets value for money in a purchase transaction, how does a bribe or kickback hurt anyone?

**Mercy Corps requires that all transactions be conducted in an ethical, fair and transparent manner.** Receipt of kickbacks by a team member means none of those things are true. Vendors who pay kickbacks will likely start getting their money back by providing lower quality goods or inflating prices. Eventually, Mercy Corps will have a damaged reputation, spend more money than it would have, and no longer gets value for money. Kickbacks are also unfair to vendors who follow the rules.

In my country, it is expected that you "slip a little money" to government officials in order to get things done. Is this acceptable?

No, this is not acceptable and would violate Mercy Corps' Anti-Bribery policy.

What happens once I report an allegation or suspicion of bribery?

**Mercy Corps takes all reports seriously and will act upon the report.** The allegation will be investigated using a thorough and objective process. Serious allegations of bribery may result in the subject of the allegations being suspended while the investigation is conducted.