



The Commonwealth

## **ANTI-BRIBERY POLICY**

Version: 4.0

Effective Date: November 2025

## **1. Purpose**

- 1.1. The Commonwealth Secretariat has a zero-tolerance policy towards bribery. It is committed to acting professionally, fairly with integrity in all its activities and relationships. It will implement and enforce effective systems to counter bribery.
- 1.2. The reputation of the Commonwealth Secretariat in operating ethically, respecting national laws and in accordance with international administrative law is of paramount importance in maintaining support from Member Countries.

## **2. Scope**

- 2.1. This Policy applies to the Commonwealth Secretariat's ('Secretariat') conduct both in the United Kingdom (UK) and abroad and to all employees of the Secretariat, including temporary agency staff, interns, consultants and any seconded staff (together "Staff").
- 2.2. All Staff and Counterparties (includes implementing partners, Sponsors, Associated Organisations, suppliers and other entities which may present and promote the work of the Secretariat) are required to:
  - a) comply with any anti-bribery legislation that applies in any jurisdiction in any part of the world in which they might be expected to conduct Secretariat activities;
  - b) act honestly, responsibly and with integrity; and
  - c) safeguard and uphold the core values of the Secretariat by operating in an ethical, professional and lawful manner at all times.
- 2.3. Counterparties will be expected to have in place adequate procedures to prevent bribery and use all reasonable endeavours to ensure that they comply with the Secretariat's Policy relating to prevention of bribery (as updated from time to time).

## **3. Policy Statement**

- 3.1. Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.
- 3.2. Industry practices may vary from country to country or from culture to culture and what is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidance set out in this Policy is expected of all Staff and Counterparties at all times, irrespective of where activities are being carried out.
- 3.3. If you are in doubt as to what might amount to bribery or what might constitute a breach of this Policy, you should refer the matter to the Director of Human Resources and Facilities Management or Director of Corporate Compliance or Legal Counsel.

## **4. Objectives of the Policy**

- 4.1. This Policy sets out the position of the Secretariat on any form of bribery and provides guidance aimed at:
  - a) ensuring compliance with anti-bribery laws, rules and regulations, not just within the UK but in any other country where the Secretariat may operate, or in relation to activities to which it may be connected;
  - b) enabling Staff and Counterparties to understand the risks associated with bribery and to encourage them to be vigilant and effectively recognise, prevent and report any wrongdoing, whether by themselves or others;

- c) providing suitable and secure reporting and communication channels and ensuring that any information that is reported is properly and effectively dealt with; and
- d) creating and maintaining a rigorous and effective framework for dealing with any suspected instances of bribery.

## **5. Legal obligations and Considerations**

5.1. A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory or personal advantage.

5.2. It is a criminal offence to:

- a) offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct;
- b) request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct; or
- c) bribe a foreign public official.

5.3. Staff and Counterparties can be held personally liable for any such offence. The Secretariat can also be held accountable for failing to prevent Staff or a Counterparty from bribing another person in the course of its activities. This may result in adverse financial consequences for the Secretariat and cause it to suffer substantial reputational damage.

## **6. Record keeping**

6.1. All accounts, receipts, invoices and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy and completeness. Payments and transactions must not be adjusted to facilitate or conceal improper payments.

6.2. A formal record must be kept of gifts and hospitality provided and received where it has a value exceeding (or estimated to exceed) £100 total or the cumulative total value exceeds (or is estimated to exceed) £100 in any rolling twelve (12) month period.

## **7. Gifts and Hospitality**

7.1. For the Secretariat's principles and policy in relation to the receipt of gifts from third parties and corporate hospitality offered to, or received from third parties, please refer to the Staff Rules in the Staff Handbook. These provisions form part of the Commonwealth Secretariat's position of zero-tolerance towards bribery, and they should be read in conjunction with this Policy.

7.2. The acceptance of gifts and hospitality by Staff or Counterparties shall only occur when all of the following criteria apply:

- a) the offer has been made for a proper business or charitable purpose, is consistent with reasonable custom and practice, and is not made with the intent or appearance of improperly influencing the individual recipient(s) or the Secretariat;
- b) acceptance is consistent with the purposes of the Secretariat, for promoting the values and reputation of the Secretariat, or aiding the establishment and maintenance of collaborative, professional or business relationships with partners and supporters of the Secretariat;
- c) the gift or hospitality offered is appropriate and the value, whether estimated or known, appears reasonable and proportionate to the circumstances;

- d) acceptance is in accord with all applicable Secretariat policies; and
- e) gifts and hospitality are received and acknowledged openly, without any degree of secrecy attached.

7.3. The provision of gifts and hospitality is not prohibited as an absolute rule. The aim of any hospitality should be to better present services or to establish good working relationships. The gifts and hospitality should be proportionate and reasonable in the circumstances, and the following standards should be met when giving such a gift or hospitality:

- a) it is not made with the intention of influencing a third party to obtain or retain business or an operational advantage, or to reward the provision or retention of business, or for an operational advantage; nor solely to provide personal entertainment;
- b) it is in accord with all applicable Secretariat policies;
- c) it is given in the name of the Secretariat and not in the giver's personal name;
- d) it does not include cash or a cash equivalent (such as gift vouchers);
- e) it is of an appropriate and reasonable type and value, and given at an appropriate time; and
- f) it is given openly, not secretly.

7.4. It is not acceptable:

- a) to give, promise to give, or offer a payment, a gift or hospitality with the expectation or hope that an operational advantage will be received;
- b) to reward an operational advantage already given; or
- c) to accept a payment, gift or hospitality from a third party that you know or suspect is offered or provided with the expectation that it will obtain an operational advantage for them.

7.5. Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is strictly prohibited.

7.6. Accepting or requesting money, travel, meals, entertainment, gifts, favours, discounts, or anything of material value from bidders or prospective bidders in a procurement process is prohibited.

## **8. Reporting Procedures**

8.1. Any knowledge or suspicion that Staff member or Counterparty has received or offered a bribe or plans to offer, promise or give a bribe in connection with the activities of the Secretariat must be immediately disclosed to the Director Human Resources and Facilities Management or Director of Corporate Compliance or Legal Counsel or via Navex Global.

8.2. Violations of national anti-bribery laws, rules and regulations (including acts committed on the premises of the Secretariat) may be referred to the local authorities.

8.3. The Secretariat is committed to taking appropriate action against bribery and encourages all Staff and Counterparties to be vigilant and to report any unlawful conduct, suspicions or concerns promptly so that an investigation may proceed and any necessary action can be taken quickly.

8.4 The Secretariat may report any incidences raised to an appropriate external government department, regulatory agency or the police and/or take internal disciplinary action against relevant staff and/or terminate contracts with Counterparties.

8.5 The Secretariat will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. The Secretariat is also committed to ensuring nobody suffers any detrimental treatment as a result of refusing to take part in bribery, or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or corruption offence has taken place or may take place in the future.

8.6 Confidentiality will be maintained during any investigation to the extent that this is practical and appropriate in the circumstances.

## **9. Non-Compliance with the Policy**

9.1. Non-compliance with any of the provisions of this Policy may constitute a disciplinary offence and maybe dealt with in accordance with the disciplinary procedure set out in the Staff Handbook.

9.2. As far as Counterparties are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement as applicable.

## **10. Supporting Documents**

10.1 This Policy should be read in conjunction with:

- a) the Staff Handbook specifically, Gifts and Hospitality Policy and Code of Ethics
- b) Counter Fraud and Corruption Policy
- c) Whistle-blowing Policy
- d) Non-Retaliatiion Policy
- e) Code of Ethics
- f) Applicable Corporate Policies

## **11. Roles and Responsibility**

11.1 Responsibility for maintaining this Policy is with the Director of Corporate Compliance.

## **12. Policy Review**

12.1 This Policy will be reviewed for fitness of purpose every 3 years or earlier if required.

12.2 The Policy and any changes to it will be approved by the Corporate Affairs Committee.

## **13. Implementation / Communication**

13.1 This Policy will be implemented via an announcement on Compass.

## 14. Version Control

Version	Date	Description of changes	Reason	Approved By
1.0	Dec 2012		Review by Legal Counsel	Director, CSD
2.0	Feb 2013		Review by Legal Counsel	Director, CSD
3.0	Apr 2021	Policy Review	Review by Legal Counsel	CAC/DSG
4.0	Nov 2025	Policy review including formatting changes in line with the policy Template and other updates including changes for reporting and changed policy owner.	Periodic review	CAC