

## ANTI-BRIBERY POLICY

### Introduction

AMI values its reputation for ethical behaviour, integrity and probity. We recognise that over and above committing a crime, any involvement in bribery would reflect badly on our image and reputation.

The Dutch Bribery Act (“Anti-Corruptie Wetgeving”) is part of the Penal Code of the Netherlands. The “*Anti-Corruptie Wetgeving*” not only makes bribery and corruption illegal, but also holds companies and organisations liable for failing to prevent such acts by those working for or on its behalf, no matter where the act takes place. The “*Anti-Corruptie Wetgeving*” came into force already in 2001 and had a revision which came into force 1 January 2015. The law imposes criminal penalties for individuals and organisations.

### Definition

Bribery is the accepting, offering or soliciting of gifts, money, hospitality or other favours in return for providing something of value or advantage to the briber. The purpose of this policy is to set out the rules that must be followed in AMI to ensure that no bribery occurs.

### Associates of the Organisation

If AMI fails to prevent bribery by a person associated with it, then AMI is liable even if it was unaware of the bribe. A person will be associated with AMI if they perform services on its behalf, which will include employees, Board Trustees, and agents purporting to act on our behalf.

### Unacceptable behaviour

The following behaviour is unacceptable, and must not occur:

Accepting any financial or other reward from any person in return for providing some favour that is not authorised by an AMI signing authority is illegal.

Requesting a financial or other reward from any person in return for providing some favour that is not authorised by an AMI signing authority is illegal.

Offering any financial or other reward to any person in return for providing some favour that is not authorised by an AMI signing authority is illegal.

### Responsibilities of staff

All staff should be aware of this policy and should understand the implications.

Examples of areas which may attract a bribery risk are:

Accepting a payment or donations in return for acceptance into a course

A member of staff accepting an invitation from the Organisation’s suppliers, to attend events as their guest where the supplier or individual intends to secure an improper advantage

Acceptance by a member of staff of a lavish gift

Accepting a charitable donation from a business tendering for a contract with AMI or favouring donors when choosing suppliers.

If staff are concerned about anything they see or hear about, they should contact the Executive Director, Chief Financial Officer or Chief of Staff for advice.

In addition, all staff are to be made aware of the policy and their responsibilities during their induction training when they join AMI staff.

## Expenses

Within AMI all expenses are arranged in accordance with the AMI-Staff Expense Policy date 10 October 2017.

If there is any concern about any item(s) of expenditure there should be full investigation of the expense.

## Receiving hospitality

Customers, suppliers or others may invite staff to a hospitality event. The Chief of Staff or Executive Director must be informed about the invitation and give permission before the invitation is accepted.

## Offering gifts and hospitality

The Organisation does not offer gifts or hospitality. This policy is not meant to prohibit the following practices providing they are customary, proportionate and are properly recorded:

normal and appropriate hospitality for guests and visitors

the giving of a ceremonial gift on retirement, or completion of event such as a speech at a conference

## GIFTS AND HOSPITALITY

This policy does not prohibit accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining AMI's image or reputation, or promoting global goals. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment.

Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts valued at more than €150 should only be accepted where refusal would cause embarrassment or offence. Where possible, these should be returned with a note explaining AMI's policy. Where gifts over €150 are accepted from individuals or organisations, they should be reported to the Chief of Staff, Chief Financial Officer or Executive Officer and they will be recorded in a register. If high value gifts are given to the Executive Director or President of the Board, these will be reported to the Honorary Treasurer.

## Donations to organisations

Donations should not be made with AMI money or resources to a charity without the prior approval of the Executive Director.

No donations should be made to charities, political parties or other organisations with the intention of gaining a business advantage.

## Attempts to bribe

If, for whatever reason, you are concerned that you are potentially being bribed, you should report this immediately to the Executive Director, Chief Financial Officer or Chief of Staff.

## Disciplinary action

Any employee found to have offered, accepted or solicited a bribe will face disciplinary action, which could include dismissal.

## ANNUAL REVIEW

We are committed to reviewing our policies and good practice annually.

This policy was last reviewed on 11 November 2021.

A handwritten signature in blue ink, reading 'Lynne Lawrence', with a long horizontal flourish extending to the right.

Lynne Lawrence  
Executive Director  
Association Montessori Internationale