

# Anti-Bribery Policy



## **SUMMARY**

The Corporation of the Township of Matachewan (the “Business”) is committed to preventing bribery, ensuring that business is conducted in a fair and professional manner, and complying with applicable laws.

The Anti-Bribery Policy (the “Policy”) is intended to supplement, but not supplant, all applicable laws and rules.

## **SCOPE**

This Policy applies to all employees of the Business.

This Policy also reflects the standards to which we expect our external consultants, contractors, agents, or any other third-party service providers to adhere when acting on our behalf. Appropriate diligence will be conducted before engaging with any third parties.

## **DEFINITION**

Bribery is the offer, promise, or payment of cash, gifts, rewards, excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person’s views or conduct or to obtain an improper advantage.

Bribery may take many forms, including but not limited to an offer, promise, provision, or acceptance of:

- Cash payments
- Kickbacks
- Political contributions
- Gifts
- Travel
- Hospitality
- Reimbursement of expenses

## **POLICY STATEMENT**

Bribery is strictly prohibited at the Business.

It is prohibited, directly or indirectly, to offer, give, request or accept a bribe, in any form whatsoever, to or from any person or company in order to gain commercial, contractual, regulatory, or any other advantage for the Business, or in order to gain any personal advantage for yourself or anyone connected to you.

The giving and receiving of gifts and hospitality to and from third parties does not always constitute bribery (e.g. where nothing is expected in return or where otherwise permitted by applicable laws). However, you may not offer or accept any gift or hospitality to or from any party in connection with our business without receiving prior written approval from your manager.

## **REPORTING**

If you are offered a bribe or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact your manager, who may ask you to provide a written account of events.

If you have any suspicions or concerns or you become aware of any conduct that would violate this Policy, you must report those concerns or actions to your manager.

The Business encourages openness and will support anyone who raises genuine concerns in good faith, even if they later turn out to be mistaken.

No individual who, in good faith, reports a violation of this Policy shall suffer any retaliation. An employee who retaliates against someone who has reported a suspected violation in good faith is subject to disciplinary action up to and including termination of employment.

No person will suffer a penalty or other adverse consequences for reporting possible wrongdoing or refusing to engage in bribery or other conduct prohibited by this Policy.

## **RECORDKEEPING**

Gifts and hospitality received must be appropriately disclosed and reported to your manager. A record will be made of every instance in which gifts or hospitality are given or received.

## **CONTRAVENTIONS OF THE POLICY**

The Business takes any actual or suspected breach of this Policy seriously and will carry out a thorough investigation should any allegations arise.

An employee who violates this Policy is subject to disciplinary action up to and including termination of employment without notice or pay in lieu thereof.

The Business also reserves the right to terminate contractual relationships with any third party who has agreed to comply with this Policy and has violated same. It is the responsibility of all employees who sign agreements on the Business's behalf to ensure that the other party contractually agrees to comply with this Policy.

In cases where the conduct violates applicable laws, rules, and regulations, the Business may also refer the matter to appropriate regulatory authorities, which could result in penalties, fines, or imprisonment.

## **REVIEW OF THE POLICY**

This Policy will be reviewed and may be amended from time to time based on the needs and experiences of the Business.

## ACKNOWLEDGEMENT & AGREEMENT

I acknowledge that I have read, understand, and agree to abide by the Anti-Bribery Policy.

**SIGNATURE:** \_\_\_\_\_

**NAME:** \_\_\_\_\_  
Print

**DATE:** \_\_\_\_\_