

ANTI-CORRUPTION AND FRAUD PREVENTION POLICY

Approved by the Board of Directors on October 13, 2020

1. OBJECTIVES

This policy aims to prevent, detect, mitigate and manage the risks related to corruption, fraud and other related organizational hazards, as a way to preserve the long tradition of integrity and credibility CECI has built for itself since its foundation.

It also aims to reaffirm and confirm CECI's principles in its work to prevent and fight against corruption and fraud, as well as to develop and consolidate a culture of compliance within the organization.

Following the principles set out in CECI's Code of Conduct and Ethical Rules, this policy contributes to the protection of the communities CECI works with.

2. SCOPE

CECI is committed to meticulously respecting all applicable anti-corruption laws and policies and to maintaining the most rigorous ethical standards in its commercial and administrative relations, both internally and externally, in order to carry out its activities with a maximum of integrity.

This policy applies to all CECI's commercial transactions in all countries where the organization operates and/or conducts its activities. It applies to all employees, regular or temporary, officers, directors, administrators, members of the country advisory committees, project employees, consultants, suppliers, subcontractors, volunteers and partners. It is an integral part of any contract signed with CECI.

The organization expects all the above mentioned persons to familiarize themselves with this policy and respect it.

This policy sets a holistic frame of reference. It provides the tools to identify and deal with issues of corruption, fraud, conflict of interest and other irregularities, such as bribery and misuse of funds, and to apply appropriate sanctions and disciplinary measures wherever appropriate.

Whether at CECI's head office or in the program countries, the prevention and detection of corruption, fraud or other irregularities are individual and collective responsibilities governed by this policy and by CECI's internal controls guide.

Any irregularity relating to some ethical or moral behaviour is governed by CECI's Code of Conduct and Ethical Rules.

Failure to comply with this policy may result in sanctions, including disciplinary action up to and including layoff, termination of contract or dismissal, as the case may be.

Anyone violating this policy may also face legal action and severe penalties that could include jail time. These penalties vary depending on the offence.



The mission of CECI is to combat poverty and exclusion through sustainable development projects in Africa, Asia and the Americas since 1958.

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3. STATEMENT

CECI has a zero-tolerance approach to corruption and fraud. All CECI stakeholders must comply with this policy related to corruption and fraud, all anti-corruption laws of Canada and the United States, and all other applicable anti-corruption laws.

Corruption and Fraud

Corruption

The term corruption means a payment, an offer, a promise or an authorization to pay anything of value:

- (a) delivered directly or indirectly (i) to a public official, (ii) to any person for the benefit of a public official, or (iii) to any person knowing that such thing of value will thereafter be offered, given or promised, directly or indirectly, in whole or in part, to a public official;
- (b) for the following purposes (or in return for them):
 - influencing any act, omission or decision of a public official in the course of his duties;
 - inciting a public official to perform or omit to perform any act going against their legitimate service;
 - obtaining an undue advantage;
 - inciting a public official to use their position to influence any act or decision of a State, an international public organization or any other organization for which they perform functions;
- (c) to obtain or maintain an advantage in the course of their activities.

References:

Corruption of Foreign Public Officials Act (Canada) (CFPOA)
Foreign Corrupt Practices Act (United States)

See Appendix A for more details

Fraud

Fraud is defined as an intentional act, a misrepresentation or the concealment of a dishonest or illegal act, including the embezzlement of funds, securities, supplies or other tangible or intangible assets (such as intellectual property or confidential or privileged information).

The term fraud, or other irregularities including fiscal irregularity, includes the following, without limitation:

- a) Theft of money, property or assets, documents or data;
- b) Hacking;
- c) Falsification of documents;
- d) Failure to report money or financial transactions;
- e) Taking advantage of privileged information regarding the activities of the organization;
- f) Disclosure of confidential and proprietary information;
- g) Destruction, removal or improper use of information or assets;
- h) Bribery: offering, giving, receiving or accepting any advantage in order to influence an official initiative or a business decision;
- i) Misappropriation of funds: using funds for purposes other than those for which they were originally intended;
- j) Overbilling: asking or accepting that the supplier of a good or service presents an invoice for an amount greater than the actual cost.

References

Black's Law Dictionary (United States)
Association of Certified Fraud Examiners (United States)

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Public agent

- a public servant, director, agent, employee or person acting in an official capacity for or on behalf of a government, or department, agency, entity, board of directors, commission, court, minister, tribunal, authority or organization of that government or of a public international organization (such as the United Nations);
- a person who holds a legislative, administrative or judicial mandate in a government;
- elected officials, candidates for political office, political parties and party officials (including leaders, employees and representatives of political parties);
- a civil servant, director, agent, employee or person acting in the name or on behalf of a company or an instrument of government (such as a national oil company or other company owned or controlled by the state);
- a person who performs a public function for a government, including a person employed by a board of directors, a commission, a corporation, another authority or another body that is established to perform a public function on behalf of the government, or that performs such a function;
- a relative or a close associate of the above-mentioned persons is considered here as a public official (see Appendix A, point 3, last paragraph)

Different practices are covered by this policy:

Inappropriate payments

It is prohibited to pay, offer, or promise to pay, authorize, solicit, or accept a bribe or kickback, directly or indirectly through an intermediary.

Bribe

Bribes are improper, undisclosed payments made to obtain preferential treatment

Occult Commission (Discount, Kickback)

A kickback is the immoral or illegal restitution of part of a sum already paid or owed under a legal contract.

Bribe

In the event of a bribe request, i.e. if a public official or other person asks to receive something of value in exchange for their influence in relation to an official act, to a decision to obtain or to retain a contract, or for a contract to be granted to a particular person, or to obtain an undue advantage, it is required to:

- a. refuse or declare not being authorized to acquiesce at the request of the public official or other person;
- b. report to the compliance officer any situation where a public official appears to be acting in a manner that violates the scope of their duties.

If a new transaction takes place with this public agent, a witness must be brought during the exchanges for protection against allegations of an inappropriate offer of consideration.

Compliance Officer

Designates the person or team responsible for the issues of compliance, fraud prevention and corruption within the organization.

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Facilitation payments

Facilitation payments are small payments made to expedite or secure the execution by a public official of any routine act that is part of that official's duties, such as issuing a government permit, a licence or some other document.

Public facilitators

Said of intermediaries, including lobbyists, whose goal is to do canvassing, i.e. to identify economic agents, government authorities, companies or individuals, to connect and support for them to achieve certain specific objectives.

Facilitation payments differ from bribes, which are generally aimed at enticing officials to commit acts that they otherwise would not do, such as awarding a contract. Facilitation payments are typically small, unofficial, unlisted payments requested by public facilitators and made to secure or expedite a routine action or service that a person or business usually and legally has the right to obtain by paying fees that are publicly known and published. These payments generally do not involve discretionary decisions on the part of the public official and are made to expedite actions that should be carried out anyway. The amount and frequency of these payments may vary among public officials.

Facilitation payments are a gateway to bribes. While facilitation payments may appear small, harmless, and a part of doing business in some jurisdictions in order to get expedited service from public facilitators, they eventually lead to higher and higher payment requests while sending the message that the organization is willing to pay bribes.

In the event of a request for facilitation payments or similar payments, the incident should be reported immediately, in writing, to the compliance officer.

Facilitation payments are illegal under the CFPOA and no such payment is permitted under this policy, unless one's own health and safety is at risk. Any attempt or request must be documented and reported to the compliance officer.

Payments to Ensure One's Own Safety

If a member of the organization is the victim of an extortion attempt by threats to their personal security, payments that would otherwise be prohibited can be made. In such circumstances, these payments must be:

1. accurately accounted for in the organization's accounting records as extortion payments made to preserve personal safety;
2. be reported as quickly as possible to the compliance officer, who will immediately consult with the Executive Director and other relevant senior management, if required, to determine the action to be taken.

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Gifts, Meals and Entertainment

Gifts, meals and entertainment offered to public facilitators may constitute bribes. Such gifts or benefits will be considered as bribes if it appears that they were intended to influence the recipient to obtain or retain an advantage in the context of work. Therefore, no gifts, meals or entertainment should be offered to public facilitators as a reward or encouragement for preferential treatment. In addition, none may be offered, directly or indirectly, with the intention of or to unduly obtain or maintain business, or to unduly direct business to a person, or to obtain an undue advantage.

In certain specific circumstances, customary gifts, meals and entertainment of a reasonable value may be offered to public facilitators. Any gifts or benefits offered must be modest and reasonably related to the nature of the business relationship. However, the habit of frequently offering gifts, meals or entertainment to a public official is problematic. Good judgment should be exercised when offering such gifts and paying for such expenses, considering all relevant factors, including the local context and customs as well as the appearance and nature of the gift, meal or entertainment. No gifts, meals or entertainment should be offered to public facilitators, unless doing so is legal and customary (for example, during the holidays or in the context of a wedding or funeral service) in the particular country and these gifts, meals or entertainment are reasonable and not excessive in quantity or frequency. Never should a gift be given as part of an effort to secure or retain business. No gift or benefit in cash or of clear cash value should ever be offered.

All gifts, meals, and entertainment offered to or received from public facilitators should be reported to the compliance officer and properly recorded in the organization's accounting records. The value of any gift, meal or entertainment must be declared. Certain limits are established. For more details, refer to the approval process for gifts, meals and entertainment in CECI's Internal Controls Guide.

Conflicts of Interest

All members of the organization must avoid placing themselves in a situation of conflict of interest or even an appearance of conflict of interest. Everything must be done to resolve those that may exist and disclose any possible conflict before it arises.

Conflict of Interest

A situation in which a person is responsible for a role of general interest which conflicts with professional or personal interests. Such interests could influence or appear to influence the way in which a person carries out the tasks assigned in the course of their duties.

Reference :

http://www.dictionnaire.enap.ca/dictionnaire/docs/definitions/defintions_francais/conflit_interets.pdf

Each member of the organization must complete the declaration of absence of conflict of interest and commit to immediately disclose any subsequent situation likely to lead to a conflict of interest.

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Political contribution and charitable donations

CECI does not engage in partisan politics or contribute to political parties or politicians. Those persons subject to this policy may not, in any way, participate in partisan activities on behalf of CECI. Of course, this does not prevent or prohibit participation in the political process as a citizen or in a personal capacity.

Any charitable contribution or sponsorship made on behalf of CECI must first be approved by the compliance officer and Executive Director and must be subject to a due diligence process.

Regarding the conduct to be followed in cases of acceptance of a donation in the name of CECI or of a sponsorship from an external source, please refer to CECI's Policy on Accepting Donations and Sponsorships.

4. DUE DILIGENCE

Due diligence is a duty of foresight exercised by CECI or its representatives, which consists of taking the necessary measures to prevent, detect, mitigate or manage the risks associated with fraud and corruption.

Transactions

Standard operational risk assessments are carried out periodically in order to determine the extent of controls necessary depending on CECI's activities, including, but not limited to, policies and procedures for the procurement of goods and supplies, calls for proposals and antiterrorism checks contained in the Internal Controls Guide.

During the early stages of acquiring potential goods or services, the compliance officer, or the person responsible for contracts must review and assess the level of due diligence required. This is to ensure that, in the efforts of due diligence, compliance with anti-corruption legislation is considered and adequately addressed.

File Keeping

CECI keeps records and files of all due diligence measures and risk assessments, as part of the internal control and record-keeping system.

Facilitating Agent / Associated Entities

Before retaining the services of an agent (regardless of where their activities are carried out) or associated entity, or entering into an agreement with them, CECI's contract givers (project managers, country directors, project leaders, members of management, employees) must carry out a risk-based due diligence process for this agent or associated entity.

Facilitating Agent

Person or entity, including lobbyists, whose services are retained by CECI and its country offices to represent its interests in connection with the achievement of its mission, to act on its behalf or on behalf of its country offices or to represent it before public and private institutions.

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Associated Entities

Any third party (person or organization) providing services on behalf of CECI or its country offices, including partners, consultants, representatives, distributors, contractors, subcontractors, suppliers and consortia.

The hiring or retention of persons who are related to, or who are dependent on or have been recommended by, public facilitators, facilitating agents or other associated entities, may result in a violation of this policy and of laws against corruption or conflicts of interest. CECI executives will take all reasonable steps within their power to ensure that the organization and its international offices do not hire or retain employees and candidates who are in such a position without exercising sufficient due diligence.

Agreements Concluded with Facilitating Agents and Associated Entities

Relationships with facilitating agents and associated entities must have an appropriate, clearly defined operational rationale, and be fully and properly documented in written agreements with all dispositions approved by the compliance officer. Such dispositions must include the obligation to comply with the applicable anti-corruption legislation.

Special Approval for Certain Facilitating Agents or Associated Entities

The compliance officer must provide their prior written approval if an agreement with a facilitating agent or associated entity includes a premium or a transaction closing fee, or if the facilitating agent or associated entity is likely to interact with public facilitators.

Monitoring and Management of Facilitating Agents and Associated Entities

In all cases, CECI must:

1. inform facilitating agents and associated entities of their obligation to comply with anti-corruption laws and this policy;
2. take the reasonable steps within their power, based on risk, to ensure that these facilitating agents and associated entities comply with applicable anti-corruption laws and practices;
3. ask facilitating agents and associated entities for reciprocal commitments in terms of compliance.

Any violation by these facilitating agents, associated entities or their representatives, in relation to services rendered for CECI or to assets in which CECI has an interest, must be immediately reported in writing to the compliance officer.

CECI will thus take reasonable measures considering the nature of the role of the agent or associated entity and the degree of risk they present) within the limits of its powers to ensure the following:

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1. All payments made to a facilitating agent or associated entity do not exceed the amounts indicated in the written agreement signed with the agent or associated entity, and constitute an appropriate compensation for legitimate services rendered by this agent or associated entity;
2. No part of these payments is transferred by the facilitating agent or associated entity as a bribe or kickback, or otherwise violates applicable laws or this policy;
3. Each invoice from a facilitating agent or associated entity includes a detailed description of the services provided;
4. The activities of the facilitating agents and associated entities are monitored to ensure that nothing violates applicable laws or this policy.

Warning Signs

Although the list is not exhaustive and warning signs may vary depending on the nature of the transaction, the reimbursement or payment request, the geographic market or the industry, here is a list of common warning signs that should be considered as part of a due diligence process:

1. An individual, facilitating agent or associated entity currently has close professional, personal or family ties with a public official, has recently been a public official, or is qualified solely because of the influence that they exert on a public official;
2. A facilitating agent recommends or insists on the use of a particular business partner, associate or agent;
3. An individual, facilitating agent or associated entity refuses to accept anti-corruption contractual terms, uses a shell company or other unorthodox business structure, insists on unusual or suspicious contractual procedures, refuses to disclose the identity of its owners or requests that the agreement be backdated or otherwise modified in order to falsify information;
4. An individual, facilitating agent or associated entity has a bad reputation or has been the subject of allegations of bribes, kickbacks, fraud or other reprehensible acts, or they have poor or non-existent references from third parties;
5. An individual, facilitating agent or associated entity has no office, staff or adequate qualifications to provide the services required;
6. A request for reimbursement or payment by an individual, public official or associated entity is unusual, is not supported by adequate documentation, is abnormally high or disproportionate to the products to be acquired, does not correspond to the terms of a master agreement, requires the use of cash or of an off-the-books account, comes from a territory other than the country in which the services are or will be provided, or is in a form that does not respect local laws.

5. INTERNAL CONTROLS AND BOOKKEEPING

CECI maintains an effective system of internal controls to combat violations to this policy, in particular through financial and organizational control mechanisms targeting accounting practices and other operational processes.

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The use of false documents and false invoices is prohibited, as are inadequate, ambiguous or misleading accounting entries, and technical procedures or accounting devices of any kind which conceal or mask illegal payments.

More specifically, there should be no:

- Off-book or secret accounts;
- Unrecorded (or inadequately recorded) transactions in CECI's accounting documents;
- Non-existent expenses or financial liabilities recorded with incorrect identifying information in CECI's accounting documents;
- Intentional destruction of accounting documents earlier than permitted by law, or by CECI's contractual commitments, or by the Internal Controls Guide.

6. IMPLEMENTATION OF THE POLICY

Board of Directors. CECI's Board of Directors is committed to supporting the enforcement of this policy and to freeing the financial resources necessary for Management to implement it. A report to the Board of Directors on the application of the policy and the management of incidents will be presented twice a year.

Ethics and Governance Committee. CECI's Ethics and Governance Committee is responsible for reviewing the adequacy of this policy, considering relevant changes, the evolution of international laws and industry standards, and proposing modifications to the Board of Directors when necessary.

Compliance Officer. The compliance officer (CECI's Controller General) and their team (Regional Controllers) are responsible for the implementation and monitoring of this policy; they must ensure that it is applied in a uniform manner, with a clear delineation of powers. More specifically, the compliance officer is responsible for:

1. establishing the practices and controls necessary for the implementation of this policy;
2. communicating this policy to all staff, facilitating agents and associated entities of the organization;
3. implementing the training program described below;
4. ensuring there is an operational instrument to report violations of this policy;
5. reporting to the Executive Committee and the Board of Directors two (2) times per year regarding the implementation and effectiveness of this policy and the management of incidents.

Training. CECI provides training on this policy and on the standards, procedures and measures relating to the prevention and fight against fraud and corruption to all its staff upon hiring, including international staff, administrators, and stakeholders. This training is mandatory and updated annually. The training is adapted to the context of the implementation of CECI's projects.

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Commitment. All employees, managers, administrators and members of the country advisory committees must confirm their commitment by signing the Code of Conduct and Ethical Rules and completing CECI's form for the declaration of absence of conflict.

Awareness. Internal communication materials (e.g. posters, leaflets) are regularly distributed in order to emphasize the message on ethics and compliance within the organization, and to encourage employees, managers, administrators, members of country advisory committees and other stakeholders to keep building their capacities to better prevent, detect, mitigate and manage the operational risks related to fraud and corruption that could damage CECI's reputation.

Updates. This policy is updated or revised annually or as needed or depending on the occurrence of certain events.

7. REPORTING, COMPLAINT MANAGEMENT AND INVESTIGATIONS

CECI provides its employees, managers, administrators, members of country advisory committees and stakeholders with the means to express their concerns regarding the issues covered by this policy, while protecting them from reprisals for having expressed their concerns in good faith.

CECI's Code of Conduct and Ethical Rules identifies the reporting and complaints mechanism that guarantees confidentiality to anyone who reports, in good faith, a breach or wrongdoing under this policy. It is reproduced below.

Reporting

Responsibility to Report. Any suspicion, act of corruption or violation of this policy should be reported to the compliance officer. Reports of non-compliance with this policy must be documented by the compliance officer, who will ensure adequate monitoring of the situation.

Reporting Procedure. The violation must be reported through the different reporting methods available, either through the dedicated telephone line, by email at directionRH@ceci.ca, or anonymously at PEAS.PSEA.CECI@gmail.com. A report can also be made to a manager or to the country representative, who will immediately forward the information to the compliance officer, who will follow up, as necessary.

Confidentiality. All reports will be recorded and treated confidentially and will be investigated. Every effort will be made to ensure the confidentiality of the process, subject to the legal obligation to report to the competent legal authorities, or to comply with the best practices for the investigation process.

Prohibition of Reprisals. No employee shall ever suffer demotion, a penalty, or any negative consequence for refusing to pay bribes, even though such a refusal may result in the loss of business opportunities for the organization.

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An employee has the right to raise concerns about actual or potential violations of this policy, confidentially and without risk of reprisal. Reprisals by anyone for making a report of a possible violation of the law or this policy in good faith is strictly prohibited.

Reporting in Bad Faith. Any report made in bad faith could bring consequences to the person who initiated it.

Investigation

Investigation Process. The compliance officer and their team are responsible for investigating all suspected or presumed illegal acts and irregular activities as defined in this policy. Any reported violation will be investigated, in accordance with the established investigation process, and General Management will be immediately informed. In accordance with our contractual obligations, any report of any case or suspicion of fraud, corruption or any other irregularity will be promptly disclosed to the donors concerned.

If the investigation proves that fraudulent activity has taken place, the compliance officer will produce a report for General Management and, if applicable, for the Board of Directors.

Confidentiality. The compliance officer treats all information received confidentially. Any employee, manager and administrator who suspects fraudulent or illegal activities shall immediately notify the compliance officer, without attempting to personally conduct the investigation or interviews/questioning related to the suspected fraudulent act.

The results of the investigation will not be disclosed or discussed, except with the designated persons and on a need to know basis. This is important to avoid damaging the reputation of suspected persons who might subsequently be declared innocent, protecting the organization from possible civil liability lawsuits.

Disclosure Procedure. Caution should be exercised while investigating a person suspected of having committed fraud or an irregularity, to avoid laying false or erroneous charges as well as alerting the suspect that an investigation is underway.

Anyone who discovers or suspects a fraudulent activity should immediately contact the compliance officer. The employee or other plaintiff may choose to make an anonymous declaration by email at the address created for this purpose (see Reporting Procedure, Reporting subsection).

8. EFFECTIVE DATE OF THE POLICY

This Anti-Corruption and Fraud Prevention Policy comes into force after its approval by CECI's Board of Directors.

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APPENDICES

APPENDIX A: EXPLANATION OF THE DEFINITION OF CORRUPTION

The following subsections describe in detail the elements of the legal definition of corruption.

- **Payment, offer, promise or authorization to pay for anything of value.** An offer or promise may constitute a bribe, even if the public official (or intended recipient) does not actually receive payment. Likewise, an offer or promise can constitute a bribe, whether the public official accepts payment or not. The expression “anything of value” should be interpreted broadly to include anything that provides a benefit to the public official, in monetary form or otherwise. These could be kickbacks, favours, loans and loan guarantees, the use of certain goods, job offers, political contributions, or the payment of expenses or debts.
- **Delivered directly or indirectly.** This definition of corruption includes bribes paid directly to a public official or indirectly through third parties (such as facilitators) or by other means (such as stock offers). It is therefore against this policy to make any corruption-related payment through facilitators or associated entities, or to make any payment to a third party where there is reason to believe that a portion or all of the payment will be used for a bribe.
- **Public official, Lobbyist, Person for the benefit of a public official, or knowing that such a thing of value will be offered to a public official.** The term “public official” is defined in section 3 of this policy. It is essential to understand that the term “public official” should be interpreted broadly to include any person acting on behalf of or relating to governments and international public organizations, including lower-level employees of a government and consultants holding government positions. It is often difficult to determine whether a person (or an entity) is a public official. When it is not possible to determine whether a person is a public official, consult with the compliance officer.

It is also important to understand that many governments operate through entities they own and control (especially in the energy, banking, financial and healthcare sectors). This policy takes this reality into account by including in the definition of public official those employees (including lower-level employees), public servants, facilitators and other individuals acting on behalf of what we call “instruments” of government. The term “instrument” should be interpreted broadly and may include entities owned and controlled by government. To determine whether an entity is an instrument or not, we must perform a detailed factual analysis of the entity’s owner(s), control mechanisms, status and function. It is important to note that an entity can be an instrument of government even if the government does not own or control majority of its shares. It may be difficult to determine if an entity is an instrument of government. Contact the compliance officer when it is not possible to determine whether a particular entity is an instrument of government.

The definition of corruption also covers cases where a public official does not receive the benefit personally, requesting instead that the benefit be given to a family member, a political party association or any other person for the benefit of the public official. Payments made to relatives and close associates of a public official are treated as bribes paid to the public official; they are therefore prohibited. Likewise, the definition of bribery covers cases where the payment for something of value is made to a third party, and the person making the payment knows, believes, suspects, has knowledge of or has information indicating that part of this payment will be offered, given or promised, directly or indirectly, to a public official.

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- **To encourage or influence an act or an omission on the part of the public official or to use their influence.** This element concerns the aspect of acts of corruption linked to compensation (i.e. the payment or the promise made in exchange for some action or inaction, or for the promise of some action or inaction). It must be noted that the FCPA and the CFPOA prohibit payments made to public facilitators, directly or indirectly, for illegitimate purposes.
- **Benefit Within the Course of Their Activities.** A “benefit within the course of their activities” should also be interpreted broadly to cover bribes intended to obtain or retain business, or any undue advantage in the course of business.

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APPENDIX B: OTHER DEFINITIONS

The following definitions apply in the context of this policy:

Administrator: Person on the board of directors whose role is to oversee fiduciary management and approve CECI's strategic orientations.

Joint venture: Organization that is part of a consortium operating in partnership with CECI for the development and implementation of projects under its management.

Consortium: Conglomerate or group of organizations that come together for the design and implementation of projects through a consortium agreement.

Provider: Company or person delivering goods or services to CECI or its affiliates for the execution of their functions and mission.

Government: Any national, central, supranational, provincial, territorial, regional, state, municipal or local government; also includes any other political subdivision of a government, stock exchange control commissions and quasi-governmental entities.

Foreign jurisdiction: Any jurisdiction outside of Canada and the United States.

Lobbyist: Person who influences the political decisions (laws, regulations, standards) of a government for the benefit of personal interests or those of an entity, organization or professional group.

Member of the country advisory committee: Person forming part of a country advisory committee, which has an advisory role in CECI's strategic orientations in the country.

Partner: Individual or organization that participates in the implementation of projects under an agreement with CECI.

Stakeholder: Subjects who interacts with CECI. These could be collaborators, but also suppliers, customers, consultants, and subcontractors.

Politically exposed person: Person exercising (or having exercised) a high public office, or who is closely associated with such a person; could be a family member of a senior official or elected government official.

CECI Staff: Person employed by CECI in Canada or in the programming countries.

Subcontractor: Company or person who, in conformity with CECI's contracts, performs part of the work on behalf of CECI.

CECI Volunteer: Person who engages with CECI for a fixed period as part of a voluntary collaboration under a contract, and who participates or contributes to the achievement of specific components (economic, social, environmental, gender equality) of a given project/program.

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APPENDIX C: REFERENCES

CECI's Code of Conduct and Ethical Rules

<https://www.ceci.ca/en/corporate-files>

<https://www.ceci.ca/data/ceci-code-of-conduct-and-ethical-rules.pdf>

Corruption of Foreign Public Officials Act

<https://laws-lois.justice.gc.ca/eng/acts/c-45.2/index.html>

Anti-corruption, bribery and enforcement

<https://www.osler.com/en/resources/business-in-canada/browse-topics/additional/anti-corruption-bribery-and-enforcement>

Trace International Matrix

<https://www.traceinternational.org/trace-matrix>