



Anti-Corruption Policy

Introduction

It is Musicians Without Borders' policy to conduct all of our work in an honest and accountable manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity. Our Code of Conduct promotes honest and ethical behavior throughout the organization, as well as provides a mechanism to report unethical conduct.

Scope

The policy is implemented by MWB's head office in Amsterdam, under the direction of Operations Coordinator Meagan Hughes (meagan@mbw.ngo) and supervised by MWB Director Laura Hassler (laura@mbw.ngo). This policy applies to all legal and natural persons working for us or on our behalf in any capacity, including employees at all levels, trainers, volunteers, interns, contractors, external consultants, third-party representatives, partner organizations and business partners.

What is bribery?

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe. Specifically, you must not:

- 1) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
- 2) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
- 3) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 4) threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts & Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining MWB's image or reputation, or promoting our work. 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 (for example, during contractual negotiations or a tender process). 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

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must be given in the name of MWB – not your own name. Promotional gifts of low value such as MWB merchandise may be given to our existing suppliers and business partners and we can accept equivalent gifts from them.

Record-keeping

You must declare and keep a written record of all hospitality or gifts given or received and declare these to the MWB Director.

Sanctions

Any legal or natural person working for us or on our behalf in any capacity, as defined under “Scope” above, who breaches this policy may be excluded from activities on behalf of MWB or may face disciplinary actions up to but not limited to termination of their employment, service or partnership agreement. Where appropriate, a breach of this policy may be reported to the competent authorities. MWB reserves the right to recover any damages resulting from the breach from the party who committed the breach.

Complaints

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify your direct supervisor / program manager or Laura Hassler, MWB Director (+31 (0) 20 330 5012 / laura@mbw.ngo) as soon as possible. An anonymous complaint can be lodged via MWB’s [online complaint form](#). All reported concerns will be treated confidentially.

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