



**ANTI BRIBERY, CORRUPTION AND FINANCIAL CRIME (AML/CFT)  
POLICY**

**Revision October 2025**

**Approved by the Board 2 December 2025**

## **Table of contents**

SCOPE	3
APPLICABILITY	3
DEFINITIONS AND ABBREVIATIONS	3
CORE PRINCIPLES	4
ZERO TOLERANCE STATEMENT	4
SPECIFIC PROVISIONS: ANTI BRIBERY AND CORRUPTION	4
Gifts and hospitality	4
What is not acceptable?	6
Facilitation payments	6
SPECIAL PROVISIONS: ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORISM FINANCING (CTF)	7
Declaration of compliance	7
Know your partner/know your grantee procedures	7
Reporting suspicious activity	7
RECORD-KEEPING	7
REPORTING MECHANISMS	8
Protection	8
TRAINING AND COMMUNICATION	9
RESPONSIBILITIES	9
RISK ASSESSMENT, MONITORING, AND REVIEW	9

## SCOPE

The scope of this policy is to set out the responsibilities of the Global Alliance of NGOs for Road Safety in observing and upholding our policy on bribery, corruption and financial crime (money laundering and terrorist financing), and to provide information and guidance to our partners and associates on how to recognise and deal with such issues.

## APPLICABILITY

This policy applies to all individuals directly and indirectly involved in the operations and governance of the Alliance whether in a paid or unpaid capacity. This includes, but is not limited to:

- All staff members (full-time, part-time, temporary)
- Volunteers and interns
- Consultants, individual contractors and subcontractors
- Board members
- Any partner, vendor, or third-party representative acting on behalf of the Alliance.

This policy applies to the above mentioned at all times and in all locations, including at the workplace, in program implementation areas, during work-related travel, and during work-related social events. It also applies to conduct online and on social media.

The policy is provided to our other partners and associates, who will be required to take reasonable steps to ensure that in carrying out activities supported by Global Alliance of NGOs for Road Safety, they and their employees, directors and associates comply with all applicable anti-bribery, anti-corruption and anti-money laundering and counter-terrorism financing laws.

## DEFINITIONS AND ABBREVIATIONS

**Beneficial owner:** the individual who ultimately owns or benefits from an organization or transaction.

**Bribe:** a bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. A bribe can take many forms, for example, a direct or indirect promise or offer of something of value, the offer or receipt of a kickback, fee, reward or other advantage, the giving of aid, donations or voting designed to exert improper influence.

**Corruption:** is the misuse of public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

Acts of bribery or corruption are intended to influence an individual in the performance of their work to act dishonestly and/or improperly. The person being bribed is usually someone who can obtain, retain or direct business for example during a tender or contracting process or it may be through the handling of administrative tasks or customs matters.

Those engaged in bribery and corruption can include a staff member, officer, trustee or director, any person acting on behalf of Global Alliance of NGOs for Road Safety i.e. our agents, individuals or organisations who authorise someone else to carry out these acts, Government or public officials whether foreign or domestic.

**Money laundering:** actions designed to conceal or disguise the illicit origin of assets or funds derived from criminal activity (e.g., fraud, corruption, trafficking). The 1988 Vienna Convention art. 3, par. 2 definition is: "the conversion or transfer of property, knowing that such property is derived from any offense(s), for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in such offense(s) to evade the legal consequences of his actions."

**Terrorism financing:** is the act of providing or collecting funds or other assets, either directly or indirectly, with the intention or knowledge that those funds will be used, in whole or in part, to support a terrorist act, individual terrorists or terrorist organizations.

**Third party:** in this policy it means any individual or organisation you come into contact with during the course of your role.

## **CORE PRINCIPLES**

### **ZERO TOLERANCE STATEMENT**

The Alliance has a zero tolerance policy on bribery, corruption and financial crime (money laundering and terrorist financing) and will uphold all laws relevant to countering bribery, corruption and financial crime in all the jurisdictions in which we operate. We are committed to preventing the use of the Alliance funds, services or relationships for money laundering (ML) or terrorism financing (TF), or proliferation financing (PF). We welcome the international community's efforts to stamp out bribery, corruption and financial crime and support the implementation of the United Nations Convention against Corruption and United Nations Convention against Transnational Organized Crime. We encourage our partners and associates to apply all applicable anti-bribery, anti-corruption and anti-financial crime laws.

### **SPECIFIC PROVISIONS: ANTI BRIBERY AND CORRUPTION**

#### **Gifts and hospitality**

This policy does not prohibit gifts, entertainment, hospitality or other promotional expenditures (given and received) to or from third parties which are proportionate, transparent, reasonable and for bona fide purposes related to the aims and objectives of Global Alliance of NGOs for Road Safety.

The giving or receipt of gifts is not prohibited if all of the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, it is given as a ceremonial gift on a festival or at another special time (e.g. Christmas);
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Executive Director or Board Chair.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Gifts to a value of more than **\$100 USD** (or of comparable value in a different country)<sup>1</sup> should not be given or offered (to or from a single source on a single occasion) unless they have the written approval of the Executive Director or Board Chair.

All gifts and hospitality to a value of more than **\$100 USD** (or of comparable value in a different country) accepted or offered by any staff member or trustee should be entered on the register of gifts.

Travel, accommodation, and meal expenses for professional events: occasional invitations extended to Alliance staff members to attend in-person events such as conferences, congresses, or training sessions, where the host or inviting party agrees to cover the related travel, accommodation, and meal expenses, are generally not considered an act of bribery. Such arrangements are recognized as legitimate professional development or business networking, provided the expenses are reasonable, transparent, directly related to the event, and not intended to improperly influence a business decision. Similarly, occasional work-related meals with partners, stakeholders, or government officials—used to facilitate legitimate business discussion—are considered good professional practice and do not constitute an offense under this policy, provided that all other rules regarding value limits, transparency, and intent are strictly observed.

Any approval required by the above policies relating to the Executive Director must be provided by the Board Chair and vice versa.

---

<sup>1</sup> In deciding whether a gift is of comparable value, the relevant employee or Board Member should consider all surrounding circumstances including, but not limited to, the average income in the location where the recipient of the gift is based.

## **What is not acceptable?**

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope or that this will influence the decision-making of Global Alliance of NGOs for Road Safety or that a business advantage will be received, or to reward a business advantage already given;
- Or give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;
- Or accept payment from a third party that you know or suspect is offered with the expectation that Global Alliance of NGOs for Road Safety's decision making will be influenced in any way and that it will obtain a business advantage for them;
- Or accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that Global Alliance of NGOs for Road Safety's decision making will be influenced in any way and that a business advantage will be provided by us in return;
- Or threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy;
- or engage in any activity that might lead to a breach of this policy.

## **Facilitation payments**

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official (e.g. processing a visa, customs invoice or other governmental paper).

If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Executive Director or Board Chair.

If such a payment is extorted or forced under duress or because of a threat to personal safety, then the payment may be made provided that either the Executive Director or Board Chair is promptly informed, a written report submitted, and the payment recorded in Global Alliance of NGOs for Road Safety's financial records.

Kickbacks are typically payments made in return for a business favour or advantage. All Alliance partners, grant recipients and associates must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by the Alliance.

## **SPECIAL PROVISIONS: ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORISM FINANCING (CTF)**

The Alliance is firmly committed to ensuring that all its financial operations, grants management, and project activities comply with applicable AML and CTF laws and regulations. We will conduct all business with integrity and transparency, take reasonable measures to prevent and detect money laundering/terrorism financing, report suspicious activities, and cooperate with financial institutions and regulators.

### **Declaration of compliance**

The Alliance certifies that it maintains robust financial management and AML/CTF controls ensuring funds are used solely for legitimate purposes in support of global road safety initiatives.

### **Know your partner/know your grantee procedures**

The Alliance implements tiered due diligence for donors, sub-grantees, vendors, and staff members. All donors and partners are verified through official documents, sanction list checks, and background reviews:

- **Identity verification:** all partners, associates, grant recipients, and suppliers must undergo a risk-based due diligence procedure before a relationship is established.
- **Ultimate beneficial owner (UBO) identification:** reasonable efforts must be made to identify the natural person(s) who ultimately owns or controls the partner or grant recipient (if it is a legal entity).
- **Sanctions screening:** the names of partners, UBOs, and key management personnel will be regularly checked against applicable international (e.g., UN, EU, OFAC) and governmental sanctions lists.

### **Reporting suspicious activity**

**Obligation to report:** Any individual who has grounds to suspect that a transaction or relationship may be linked to money laundering or terrorist financing must immediately report the suspicion to the Executive Director or Board Chair.

**Prohibition of "Tipping off":** It is strictly forbidden for anyone within the Alliance to disclose to the partner or any third party involved that a suspicious activity report is being prepared or has been submitted.

## **RECORD-KEEPING**

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Staff members must declare and keep a written record of all hospitality or gifts to a value of more than **\$100 USD** (or of comparable value in a different country) accepted or offered on the gifts register, which will be subject to managerial review.

Staff members must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Alliance expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

All relevant documents (financial records, know-your-partner documents, reports of suspicious activity) must be retained for a minimum period of **five years** after the termination of the business relationship or transaction, as required by law.

## **REPORTING MECHANISMS**

You must ensure that you read, understand and comply with this policy. You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other concerns, these should be raised with the Executive Director or Board Chair.

The prevention, detection and reporting of bribery and other forms of corruption, as well as money laundering acts and financial crimes are the responsibility of all those working for Global Alliance of NGOs for Road Safety's or under our control. Staff members are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff members must notify the Executive Director or Board Chair as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a partner, associate or potential partner, associates offers them something to gain an advantage with us, or indicates to them that a gift or payment is required to secure their co-operation with Global Alliance of NGOs for Road Safety's supported activities.

### **Protection**

Staff members who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery, corruption or financial crime, or because of reporting in good faith their suspicion that an actual or potential bribery, corruption or other financial crime offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Executive Director or Board Chair immediately. Please refer to the [Whistleblower Policy](#).

## **TRAINING AND COMMUNICATION**

All staff members will receive relevant training on how to implement and adhere to this policy.

Our zero-tolerance approach to bribery, corruption and financial crimes will be communicated to all partners, grant recipients, associates, suppliers, and contractors at the outset of our relationship with them and as appropriate thereafter.

## **RESPONSIBILITIES**

The Board of Directors has the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Executive Director has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

The finance team conducts due diligence, monitors transactions, and reports suspicious activities.

All staff members: must comply with anti-bribery, corruption and financial crimes policies and procedures and report any suspicious activity. Any staff member who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct, according to the [HR Policy and Procedure](#).

We reserve our right to terminate our contractual relationship with our partners and associates if they breach this policy.

## **RISK ASSESSMENT, MONITORING, AND REVIEW**

As part of its annual risk assessment process the Board of Directors will monitor the effectiveness and review the implementation of this policy, considering its suitability, adequacy and effectiveness. Our control systems and procedures will be regularly audited to provide assurance that they are effective in countering bribery and corruption.

The Board of Directors and any staff members are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employment agreement and it may be reviewed and amended upon significant legal or operational changes.