

## WACC POLICY

# CONDUCT OF ACTIVITIES

*Confirmed by the Boards of Directors*

*October 2011*

## General

1. The provisions of this policy are designed to limit the likelihood of WACC being involved in bribery or other form of corruption, in supporting terrorism, or otherwise acting illegally.
2. Although the nature of the Association's operations and the magnitude of the funds distributed make the risk of involvement with such activities small, all employees, Directors and other volunteers must be vigilant to ensure that this does not occur.

## Bribery

3. Bribery is the provision of an inducement, financial or otherwise, to secure a favourable position.
4. WACC will not knowingly be a party to any bribery. No employee, or other person, acting as a representative of WACC, may give or take a bribe.
5. Any person must, if offered a bribe when acting as a representative of WACC, promptly report full details to the General Secretary, who will in turn bring the matter to the attention of the Officers.
6. The provision of reasonable 'hospitality' is not considered bribery. Should there be any doubt as to what is considered reasonable; the matter should be discussed with the General Secretary.
7. The giving of token gifts is not considered bribery. Where any gift is received by an employee who is involved in the project review process from an organisation which has applied or may apply for funding support, the matter must be reported to the General Secretary and the employee may be required to return the gift.

## Corruption

8. The names of organisations being financially supported by WACC and the amount of funding that they receive will be publically available.
9. No funds intended for an organisation may be paid to any individual, unless it can be confirmed that the full amount of the payment will reach the organisation.
10. Where it is necessary to pay a legitimate fee in order for funds to reach their destination, for example bank handling charges, the amount of such fee and the identity of the recipient shall be clearly identified in connection with the payment.
11. No payment may be made to any individual to provide services that the person would normally perform in the course of their work, unless such payment is a fee or similar charge normally levied and identified in advance.

12. The amount of funding provided to an organisation to carry out a project must be consistent with the costs reasonably likely to be incurred by the organisation in undertaking the activities. WACC will require a budget to be provided by the organisation to indicate how the funds will be spent, and an accounting for expenditures that is generally consistent with the budget.

## Terrorism

13. For the purpose of this policy, an organisation is considered to be a terrorist organisation if it has been identified as such by the government of a country in which WACC is registered, and that government has determined that it is unlawful to have dealings with the organisation.
14. WACC is mindful of the adage 'One person's terrorist is another person's freedom fighter' and recognises that it does not have the expertise to determine if an organisation is involved in terrorism. It will not, therefore, make any value judgement in this regard.
15. WACC will not knowingly give support to or receive support from any terrorist organisation as identified in paragraph 13. It will undertake reasonable measures to ensure that any organisation to which it provides financial support is a bona fide group. This will include obtaining references for any organisation with which it has not dealt previously.
16. In the event of any allegation being made that an organisation with which WACC has dealings is involved in terrorism, the relationship with the organisation will be suspended pending completion of an investigation.

## Illegal activities

17. WACC will take all reasonable measures to avoid becoming involved in or supporting illegal activities, and will not condone participation in such activities by any employee, Director or other volunteer.

## Reporting

18. Any employee becoming aware of or suspecting that there is any activity with which WACC is associated that might reflect badly on the organisation, including activities that are the subject of this policy, must bring the matter to the attention of the Manager of Administration or the General Secretary.
19. Should WACC, or any of its staff, inadvertently become involved in bribery or any other form of corruption, with a terrorist organisation, or in an illegal activity, the Association will report the matter to the appropriate authorities and will co-operate in any subsequent investigation.

## Action to be taken

20. If an employee is found to have given or taken a bribe in conjunction with their work for WACC, appropriate disciplinary action, which is likely to include termination of employment, will be taken.
21. If it is shown that any other person has given or taken a bribe while acting on behalf of WACC, the matter will be brought to the attention of the Board of Directors to take appropriate action.

## WACC Conduct of Activities

22. WACC will not provide financial support to any organisation that has failed to properly account for any funds previously provided to the organisation by WACC.
23. If an employee is found to have acted illegally while representing WACC, the employee will be subject to disciplinary action as specified in the Discipline Policy.