

# Amphibian Survival Alliance Anti-Bribery Policy

#### 1. PURPOSE

The purpose of this Anti-Bribery Policy is to articulate the Amphibian Survival Alliance's (ASA) unequivocal commitment to the prevention of bribery and corruption in all its forms. It provides comprehensive standards and guidelines to ASA personnel on recognizing, addressing, and reporting bribery and corruption.

#### 2. SCOPE

This policy applies to all individuals acting on behalf of ASA, including but not limited to Secretariat members, Global Council members, volunteers, interns, contractors, vendors, and partner organizations. The policy is applicable across all ASA operations and activities worldwide.

## 3. POLICY STATEMENT

- **3.1** ASA adopts a zero-tolerance stance against bribery and corruption, prohibiting all direct or indirect offers, receipts, or facilitation of bribes or other improper advantages.
- **3.2** ASA is committed to complying with anti-bribery laws and regulations in all jurisdictions where it operates. Efforts will be made to continuously monitor compliance.
- **3.3** ASA personnel are required to act with utmost integrity, honesty, and ethics when dealing with all stakeholders including government officials, vendors, and community members.

#### 4. DEFINITION OF BRIBERY

- **4.1** Bribery involves directly or indirectly offering, promising, giving, soliciting, or accepting any form of undue advantage to influence actions or decisions improperly.
- **4.2** Bribes may consist of money, gifts, travel, entertainment, employment offers, in-kind services, or any other items of value provided with an improper purpose.
- 4.3 Facilitation payments intended to speed up routine processes are considered bribes under this policy.
- **4.4** This policy does not prohibit reasonable and transparent hospitality expenditures or promotional gifts that are properly recorded and not intended to improperly influence decisions.

#### 5. RESPONSIBILITIES

- **5.1** All ASA personnel must read, understand, and adhere to this policy.
- **5.2** The Executive Director is responsible for the oversight of this policy, while the Global Council provides governance oversight.
- **5.3** Concerns related to bribery must be reported promptly through established reporting mechanisms.
- **5.4** All reported concerns will be investigated thoroughly, and appropriate disciplinary actions will be taken. Confidentiality will be maintained where possible.



## 6. NON-COMPLIANCE AND MONITORING

- **6.1** Violation of this policy may result in disciplinary action up to and including termination of contracts or employment, or dismissal from the partnership.
- **6.2** Allegations of bribery may be reported to local authorities if deemed necessary.
- **6.3** ASA will periodically conduct bribery risk assessments and will implement measures to monitor and ensure compliance.

## 7. TRAINING AND COMMUNICATION

- **7.1** ASA will provide regular training on this policy to all personnel. Anti-bribery clauses will be included in contracts and partnership agreements.
- 7.2 This policy will be readily accessible and communicated to all ASA personnel and associated third parties.

# 8. RECORD KEEPING

- **8.1** ASA will maintain accurate financial records and implement stringent controls for transactions identified as high-risk for bribery.
- **8.2** Comprehensive records, including gift registers, due diligence reports, training records, and other relevant documentation, will be maintained to evidence compliance.

## 9. REVIEW AND UPDATE

This policy will be regularly reviewed and updated to ensure it is effective and complies with applicable laws and best practices. All updates must be approved by the Global Council.