



WOMEN IN BUSINESS AND MANAGEMENT ('WIMBIZ')

ANTI-BRIBERY, ANTI-CORRUPTION, MONEY LAUNDERING AND

ANTI-TERRORISM POLICIES

Basis

WIMBIZ ('the Organisation') strives to undertake its activities and conduct its business fairly with honesty and transparency. This must be reflected in every aspect of our affairs. The actions and conduct of the members of the Board of Trustees, Executive Council, Associates and employees (collectively WIMBIZ Members) as well as others acting on the organization's behalf are essential to maintaining these standards. To that end, all WIMBIZ Members, including agents, consultants and contractors as well as suppliers involved in the organization's business must read, become familiar and comply with these Anti-Bribery, Anti-Corruption and Anti-Terrorism Policies.

1.0 The Policy on Bribery and Corruption

WIMBIZ is an organization that has both local and international recognition and it engages and will continue to engage others both in Nigeria and outside in its activities. Pursuant to this, in the conduct of the business of the organisation, WIMBIZ members shall not engage in **Prohibited Payments**.

1.1 Prohibited Payments means any offer, gift, payment, promise to pay, or authorization of the payment of any money or anything of value (including charitable and political contributions), directly or indirectly, to a government official, including to or for the use or benefit of any other person or entity, to the extent that one knows or has reasonable grounds for believing that all or a portion of the money or thing of value which was given or is to be given to such other person or entity, will be paid, offered, promised, given or authorised to be paid by such other person or entity, directly or indirectly, to a government official, for the purpose of either:

- 1.1.1 influencing any act or decision of the government official in his official capacity;
 - 1.1.2 inducing the government official to do or omit to do any act in violation of his lawful duty;
 - 1.1.3 securing any improper advantage; or
 - 1.1.4 inducing the government official to use his influence with a government or instrumentality thereof to affect or influence any act or decision of such government or instrumentality, in order to assist in obtaining or retaining business or in directing business to any party.
- 1.2 It is not permitted to establish accounts or internal budgets for the purpose of making facilitation bribes or influencing transactions (slush funds).
- 1.3 WIMBIZ recognizes that to refuse a gift in certain circumstances and/or countries may cause offence. The test to be applied in all circumstances is whether the gift or entertainment is reasonable and justifiable. What is the intention of the gift? Is the gift being offered for something in return (*quid pro quo*)?
- 1.4 The giving of ceremonial gifts during a festive period would be considered normal but if its value is more than ₦50,000.00 (Fifty Thousand Naira), the gift should be rejected.

2.0 The Policies On Money Laundering And Anti-Terrorism

In the conduct of the business of the organisation, WIMBIZ Members shall not engage in any transaction that WIMBIZ has classified as **Prohibited Transaction**.

Prohibited Transaction means among other things, any transaction (including any act of omission, commission, assistance to another, or aiding and abetting in furtherance of the transaction) that involves:

- 2.1** The receipt, transfer, transportation, retention, use, structuring, diverting, or hiding the proceeds of any criminal activity whatsoever, including drug trafficking, fraud, or the engaging in any transfer of funds or financial transaction to promote such an activity, including making a Prohibited Payment to a government official;
- 2.2** Engaging or becoming involved in, financing or supporting financially or otherwise, sponsoring, facilitating, or giving aid or comfort to any terrorist person, activity or organization; or
- 2.3** A Designated Party and a Designated Party means any person, entity or country:
 - 2.3.3** whose name is specified in or pursuant to, any resolution of or list issued by, the United Nations or the United States relating to the designation of a person as terrorist or terrorist organization or blocking any assets of such person;
 - 2.3.4** in respect of whom any person has received notice that all financial transactions involving the assets of such person have been or are to be, blocked; or
 - 2.3.5** who is or was convicted, found guilty or against whom a judgment or order was entered in any proceedings for violating money laundering, anti-corruption or bribery, or international economic or anti-terrorism sanction laws, or whose assets were seized, blocked, frozen or ordered forfeited for violation of money laundering or international anti-terrorism laws.
- 3.0** The Board of Trustees shall have the power to approve any request made in accordance with these policies through circularization and such approval shall be by majority. The approval so given shall be presented for



ratification and/or amendment at the next meeting of the Board of Trustees.

4.0 Application

These policies apply to all members of the Board of Trustees, Executive Council, Associates, funding agencies, partners, contractors and suppliers of goods and services of WIMBIZ and they shall all commit to these and respect these policies in order to maintain our personal and the organization’s integrity.

APPROVED BY THE BOARD OF TRUSTEES this Day of 2018.

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CHAIRMAN, BOARD OF TRUSTEES

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