

Anti-Fraud, Anti-Corruption and Anti-Bribery Policy

****Organization:**** Global Toxics Research Initiative (GRIT)

****Approved by:**** ED – Rich Fuller

****Effective date:**** July 28 2026

****Version:**** 1.0

1. Purpose

GRIT is committed to conducting all of its activities honestly, ethically and in full compliance with the law. We have zero tolerance for fraud, corruption or bribery in any form, whether committed by our own personnel or by anyone acting on our behalf.

This policy sets out what conduct is prohibited, how to recognize it, and how to report it. It exists to protect the people we serve, our donors' funds, our partners and our staff.

2. Scope

This policy applies to all directors, officers, employees, interns, volunteers and consultants of GRIT worldwide ("Personnel"), and to all sub-grantees, contractors, agents, field partners and other third parties acting on our behalf ("Third Parties"). It applies in every country in which we work, regardless of local custom or practice.

Where local law imposes a stricter standard than this policy, local law applies. Where this policy is stricter than local law, this policy applies.

We are subject to, among other laws, the U.S. Foreign Corrupt Practices Act (FCPA) and — where applicable — the UK Bribery Act 2010, as well as the anti-corruption laws of every country in which we operate.

3. Definitions

****Fraud**** — any intentional act or omission designed to deceive others, resulting in the victim suffering a loss or the perpetrator obtaining a gain. Examples include falsifying expense claims, inflating invoices, creating fictitious beneficiaries or vendors, misreporting programmatic results, and misappropriating cash, equipment or supplies.

****Corruption**** — the abuse of entrusted power or position for private gain. This includes nepotism and favoritism in hiring or procurement, and the diversion of program resources.

****Bribery**** — offering, promising, giving, requesting, agreeing to receive or accepting any financial or other advantage in order to improperly influence a person's actions or decisions. A bribe need not be cash: it may be a gift, a job offer for a relative, travel, a donation, or a favor.

****Kickback**** — the return of a portion of a payment (for example by a vendor or sub-grantee) as a reward for awarding or facilitating a contract or grant.

****Facilitation payment**** — a small unofficial payment to a government official to speed up or secure a routine action to which we are already entitled (for example, customs clearance or a permit). These are bribes and are prohibited under this policy.

****Public official**** — any officer or employee of a government, government agency, state-owned enterprise, public international organization or political party, and any candidate for political office. Note that in many countries, employees of state-owned utilities, hospitals, universities and research institutes are public officials.

****Conflict of interest**** — any situation in which a person's private interests could improperly influence, or appear to influence, the performance of their duties for GRIT.

4. Policy: Prohibited Conduct

Personnel and Third Parties must not, directly or through any intermediary:

1. Offer, promise, give, request or accept a bribe or kickback of any kind, to or from anyone, in the public or private sector.
2. Make facilitation payments.
3. Commit, attempt or assist in any act of fraud against GRIT, our donors, our partners or the communities we serve.
4. Falsify, alter, destroy or conceal any record, invoice, receipt, timesheet, sample result, monitoring report or financial statement.
5. Use GRIT's funds, assets, name or data for personal benefit or for any unauthorized purpose.
6. Make political contributions on behalf of GRIT.
7. Make charitable donations, sponsorships or in-kind contributions where these could reasonably be seen as a means of obtaining an improper advantage.

8. Award employment, procurement contracts, sub-grants or consultancies on any basis other than merit and documented process.

9. Retaliate against anyone who reports a concern in good faith.

****Personal liability.**** Individuals who engage in bribery or fraud may be personally prosecuted, fined and imprisoned, in addition to facing disciplinary action from GRIT.

5. Gifts and Hospitality

Modest, occasional gifts and hospitality are permitted only where all of the following are true. The item must be:

- given openly, not in secret;
- reasonable and proportionate in value in the local context;
- not cash or a cash equivalent (including gift cards, vouchers, loans);
- not intended or likely to influence any decision, and not offered around the time of a pending decision, tender, permit application or grant award;
- lawful under local law and permitted by the recipient's own organization; and
- accurately recorded in our books.

****Thresholds.**** Any single gift or instance of hospitality with a value exceeding USD 100 requires prior written approval from the Executive Director and must be entered in the Gifts and Hospitality Register maintained by Finance.

****Public officials.**** Gifts and hospitality to public officials require prior written approval regardless of value. Reasonable and documented travel or per diem costs for officials attending our workshops, trainings or field visits are permitted where paid transparently, at customary rates, and against receipts.

6. Third Parties, Sub-Grantees and Field Partners

Much of our exposure arises through others acting on our behalf. Accordingly:

1. ****Due diligence.**** Before engaging any sub-grantee, consultant, laboratory, vendor or field partner above [USD 5,000], GRIT will conduct and document risk-based due diligence, including screening against applicable sanctions and debarment lists.
2. ****Contract terms.**** All agreements will include anti-corruption representations, audit and inspection rights, a record-retention obligation, and a right to terminate for breach of this policy.

3. ****Flow-down.**** Sub-grantees must apply equivalent standards to their own personnel and sub-contractors.

4. ****Payments.**** Payments will be made only to the contracting party, in the country of performance or incorporation, into an account in that party's name. No payments to third-party accounts, no unexplained cash payments, and no payments to numbered or offshore accounts without written approval from the Executive Director.

7. Conflicts of Interest

Personnel must disclose in writing to the Executive Director / Board Chair any actual, potential or perceived conflict of interest as soon as it arises — including family or close personal relationships with vendors, sub-grantee staff, regulators or funders, and any outside employment, consultancy or financial interest in an organization we work with, regulate against, or investigate.

Disclosed conflicts will be recorded in a Conflict of Interest Register. The individual concerned must recuse themselves from related decisions. All Personnel involved in procurement, hiring or grant-making will complete an annual conflict of interest declaration.

8. Books, Records and Internal Controls

1. All transactions must be recorded accurately, completely and in reasonable detail, in the correct period and account. No undisclosed or unrecorded funds or accounts may be maintained for any purpose.

2. Expenditure must be supported by original documentation. Where receipts are genuinely unavailable in a field setting, a signed expenditure declaration approved by [role] is required.

3. Segregation of duties applies: the person who requests a payment may not be the person who approves it or the person who executes it.

4. Procurement above USD 25,000 requires a documented competitive process; sole-source awards require written justification and approval by the ED.

5. Cash handling in field settings must follow GRIT's Field Cash Management Procedures, including dual signatures and monthly reconciliation.

6. Records will be retained for at least seven years or the period required by the relevant donor agreement, whichever is longer.

9. Reporting Concerns

Anyone who suspects fraud, corruption or bribery — or who is offered, asked for, or pressured to make a bribe — must report it promptly. You do not need proof; a good-faith suspicion is enough, and it is not your job to investigate.

****How to report:****

- To your line manager, or
- To the Executive Director, or
- Where those channels are inappropriate or compromised, directly to the Board Chair Aud
- Anonymously via info@toxicsresearch.org

Reports may be made anonymously. Community members, beneficiaries, partners and vendors may also use these channels, and we will publicize them in the languages used at our field sites.

****Non-retaliation.**** GRIT will not tolerate retaliation of any kind against a person who reports a concern in good faith or who cooperates with an investigation. This protection applies even if the concern turns out to be mistaken. Retaliation is itself a disciplinary offense. Knowingly making a false or malicious report is also a disciplinary offense.

****Confidentiality.**** The identity of a reporter will be kept confidential to the greatest extent possible consistent with a fair investigation and our legal obligations.

****Duress.**** If you are ever coerced into making a payment under threat to your personal safety, pay it, remove yourself from danger, and report the incident to [role] as soon as it is safe to do so. You will not be disciplined for it.

10. Investigation and Consequences

The Executive Director, or the Board Chair where the concern involves the Executive Director is responsible for ensuring that every report is assessed promptly and, where warranted, investigated fairly, confidentially and by someone independent of the matter. External investigators or auditors will be engaged where appropriate.

Substantiated breaches will result in disciplinary action up to and including dismissal for Personnel, and suspension of payments, termination and recovery of funds for Third Parties. GRIT will refer matters to law enforcement where appropriate and will notify affected donors in accordance with our grant agreements and applicable reporting deadlines.

11. Responsibilities

- **The Board** owns this policy, approves it every two years, and receives a report on all concerns raised and their resolution annually.
- **The Executive Director** is accountable for implementation and for maintaining a culture in which concerns can be raised safely.
- **Finance department** maintains the registers, coordinates due diligence and training, and serves as the day-to-day point of contact for questions under this policy.
- **Country and program managers** are responsible for applying this policy at field sites and ensuring partners understand it.
- **All Personnel** are responsible for reading, understanding and complying with this policy, and for reporting concerns.

12. Training and Attestation

All Personnel will receive training on this policy at induction and at least every two years thereafter, in a language they understand. All Personnel will sign an attestation confirming that they have read, understood and complied with this policy and have disclosed any conflicts of interest.

13. Review

This policy will be reviewed at least every two years by the ED and approved by the Board, and updated as needed to reflect changes in law, donor requirements or our risk profile.

****Acknowledgment****

I have read and understood GRIT's Anti-Fraud, Anti-Corruption and Anti-Bribery Policy. I agree to comply with it and to report any concerns through the channels described.

Name: _____ Position: _____

Signature: _____ Date: _____