

Anti-Bribery & Corruption Policy

Purpose of this policy

This policy outlines The Leprosy Mission Nigeria's (TLM-Nigeria) position on bribery and corruption. It describes TLM-Nigeria's approach to prevent and take action against bribery and corruption.

What is bribery and corruption?

Bribery is defined as

The offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

The purpose of the bribe is to "induce a person to perform improperly a relevant function or activity" or to "reward a person for the improper performance of such a function or activity".

A bribe can take many forms and be of any size. Where the offer or receipt is intended for an employee's family or friends, or when bribery and corruption takes place through third parties, it is still considered to be a bribe.

What is corruption?

Corruption is defined as

The misuse of power, resources, and trusts to attain undue advantages for oneself, for a close ally or person(s); the advantage could be financial, influence, reputation, political, sexual or other gratification which is undue to a person(s). Corruption also includes deliberate failure to take action to prevent, investigate or report a suspect.

Why is it important for TLM?

The Bible is very clear that bribery and corruption is not God's way: "For the LORD your God is God of gods and Lord of lords, the great God, mighty and awesome, who shows no partiality and accepts no bribes" (Deuteronomy 10:17). Throughout the Old Testament the taking and giving of bribes is condemned by the prophets as unjust. In particular it is seen as robbing the poor. "For I know how many are your offenses and how great your sins. You oppress the righteous and take bribes and you deprive the poor of justice in the courts" (Amos 5:12). As a Christian organisation that seeks to work with the poor and disadvantaged not being involved in bribery and corruption in any form is particularly important to us.

TLM-Nigeria also recognises that we are stewards of the money, other resources, influence and trust given to us by God and our donors and would not want these abused through bribery and corruption.

The term corruption includes but is not exhaustive of:

- Abnormal cash payments
- Lavish gifts or services being received
- Invoices being agreed in excess of contract without reasonable cause
- Payments or gifts to facilitate or speed up process, or to gain favours
- Extortion
- Excessive hospitality

Scope of this policy

This policy applies to all staff members and officers of The Leprosy Mission Nigeria, and to temporary workers, consultants, contractors and agents. Every member of staff and associated person acting for, or on behalf of, The Leprosy Mission Nigeria is responsible for maintaining the highest standards of business conduct.

Statement of commitments

1. The Leprosy Mission Nigeria (TLM-Nigeria) is committed to the highest standards of ethical conduct and integrity in its business activities in Nigeria.
2. TLM-Nigeria will not tolerate any form of bribery and corruption by, or of, its staff members, agents or consultants or any person or body acting on its behalf.
3. TLM-Nigeria is committed to implementing effective measures to prevent, monitor and eliminate bribery and corruption.
4. TLM-Nigeria will take measures to prevent corruption in its work.
5. TLM-Nigeria is committed to fully investigate and deal with any instances of alleged or suspected bribery and corruption.
6. TLM-Nigeria is committed to the protection of whistle-blowers who reveal incidents of bribery and corruption, in line with TLM's Whistle-blowing Policy.