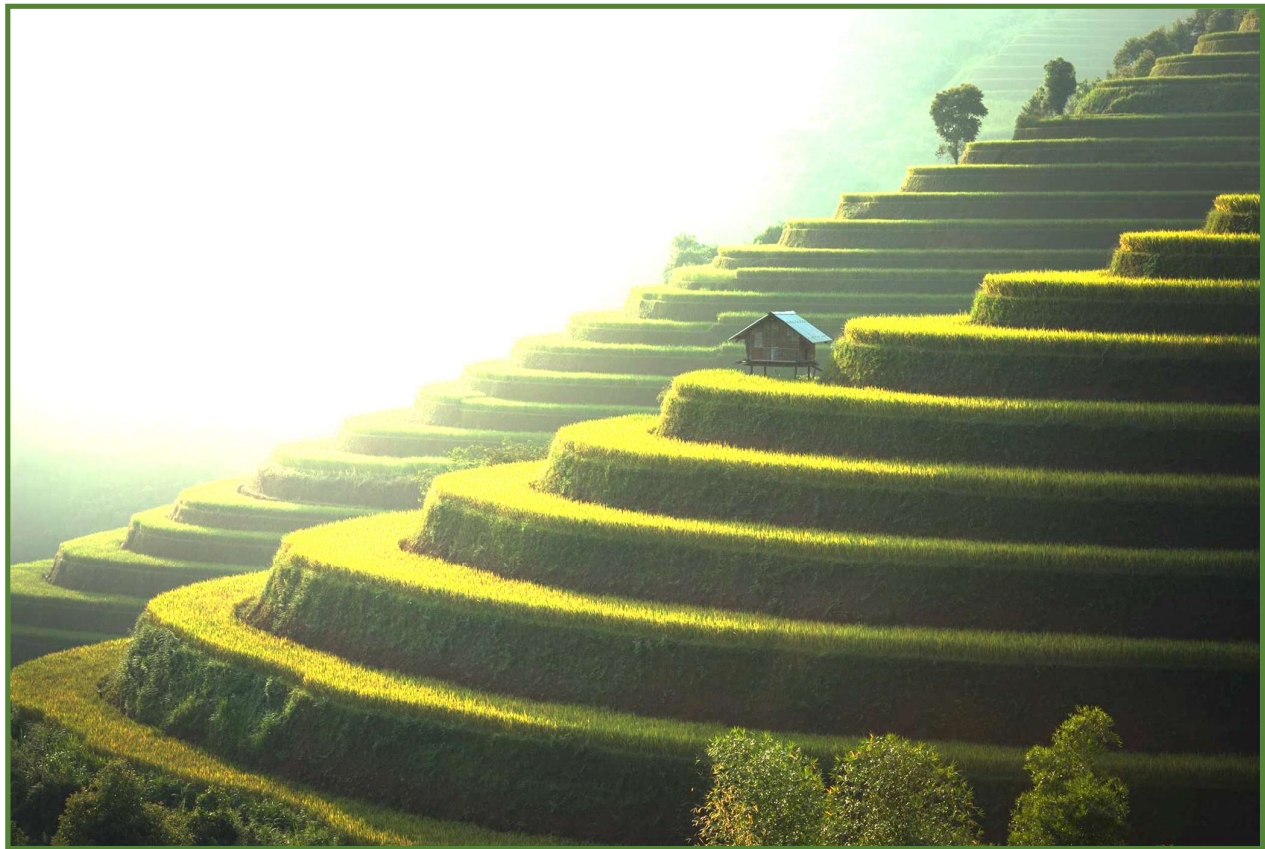

Sustainable Rice Platform Anti-Corruption Policy



Title:	Sustainable Rice Platform Anti-Corruption Policy
Document number:	PO-270923-BO-EN-010
Approval date:	27 September 2023

© Sustainable Rice Platform

This work is the intellectual property of the Sustainable Rice Platform e.V. and is published under a Creative Commons Attribution-NonCommercial-NoDerivs 4.0 International License. It should be cited as follows: SRP (2023). Sustainable Rice Platform Anti-Corruption Policy (Version 1.0). Sustainable Rice Platform. Bangkok: 2023. Available at www.sustainablerice.org.

About the Sustainable Rice Platform

The Sustainable Rice Platform e.V. (SRP) is a global multi-stakeholder alliance comprising over 100 institutional members from public, private, research, civil society and the financial sector. Originally co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and private partners, SRP is an independent member association, working together with its partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production, and by offering the global rice market an assured supply of sustainably produced rice.

Contact details

E-mail: info@sustainablerice.org

Web: www.sustainablerice.org

Contents

Purpose and Scope	4
Terms and Definitions	4
Bribery.....	5
Facilitation Payments.....	5
Gifts and Hospitality	6
Donations.....	7
Reporting and Investigation Procedure.....	8
Awareness, Training, and Prevention.....	8
Contact Information.....	9
Review Schedule.....	9
Annex A: SRP Gift and Hospitality Register	10

Purpose and Scope

The purpose of the **Sustainable Rice Platform Anti-Corruption Policy** is to establish a zero-tolerance approach to bribery, fraud, facilitation payments, and other forms of corruption; provide guidance on how to recognize and handle corruption; and set out circumstances under which charitable donations, gifts, and hospitality may be acceptable.

SRP aims to conduct its business in accordance with the highest standards of ethical and professional conduct and in compliance with the laws of countries where it operates.

SRP also aims to uphold legal standards recognized as best practice in combatting and preventing corruption, including the UK Bribery Act and relevant EU legislation.

This Policy applies to all SRP Board members, Technical Committee members, staff, consultants, and service providers, collectively referred to as "SRP participants."

Terms and Definitions

Term	Definition
Bribery	The act of offering, giving, accepting, or soliciting something of value to induce behavior or action that is illegal, unethical, or a breach of trust. Bribery can involve financial or non-financial benefits and advantages.
Corruption	Dishonest, fraudulent, or illicit behavior, typically by people in positions of power, to realize private gain.
Donations	Charitable contributions made by governments, corporations, non-governmental organizations or individuals to advance SRP's vision, mission, strategy, and programs. Donations may be financial or in-kind and are subject to internal controls before acceptance.
Facilitation payments	Also referred to as "small bribes," facilitation payments are payments used to induce government officials or market actors to perform routine functions they are otherwise obligated to perform. Facilitation payments are a form of bribery and typically demanded in exchange for expediting or securing everyday transactions. Facilitation payments can take many forms, including cash, vouchers, gift cards, calling cards, tickets to events, and alcohol, tobacco, or other drugs.
Gifts and hospitality	Material displays of gratitude, generosity, respect, or appreciation. Gifts and hospitality vary considerably by country and local contexts and customs. They may include ornaments, artifacts, books, clothing or accessories, meals, drinks, tickets, transportation, lodging, or favors.
Ad hoc Ombudsperson	And SRP participant who is assigned tasks relevant to the processing, handling, and investigation of concerns, complaints, or grievances pursuant to this Policy. Ad hoc Ombudspersons are enlisted to assist with internal processes based on their expertise and specialized training. The role of ad hoc Ombudspersons is further detailed in the Board Manual.

Bribery

SRP participants shall not offer, give, accept, or solicit any payment, benefit, or other advantage to induce behavior or action that is illegal, unethical, or a breach of trust.

This rule applies to financial as well as non-financial benefits. It also applies to certain gifts and hospitality. Hypothetical examples of bribery include:

Hypothetical examples of bribery
A third party bids for an SRP contract and offers a member of the Secretariat a promising job opportunity if they evaluate the proposal favorably.
A producer group offers a gift to an SRP Conformity Assessment Body auditor in exchange for a positive audit outcome.
A government official implies that SRP is more likely to be awarded new tax incentives if a donation is made to a preferred charity.
After launching a new National Chapter, a subnational bureaucrat promises to introduce a sustainability subsidy that could lead to more SRP-Verified crop, but as a precondition asks that a relative is hired by a major SRP supply chain Member.

More specifically, SRP participants shall not:

- *Offer or give* any benefit with the intention of influencing someone to perform an official function improperly, or where the acceptance of such benefit alone would itself be improper; or
- *Accept or solicit* any benefit, whether for oneself or someone else, where this would influence or be perceived to influence the performance of one's official duties, or where the acceptance or solicitation alone would itself be improper.

In line with the SRP Code of Conduct, all participants carry a duty to immediately report all suspected, observed, or experienced acts of bribery following guidance in the ["Reporting a Concern"](#) section of this Policy.

Facilitation Payments

SRP participants shall not plan, make, accept, demand, or otherwise participate in transactions involving facilitation payments.

Facilitation payments are a form of bribery, and situations involving facilitation payments can surface in different ways. The most common situation is one where a low-level official or bureaucrat explicitly or implicitly asks for payment to execute a routine service to which a would-be bribe payer is already legally entitled.

In requesting or demanding payment, the bribe-seeker may indicate or threaten that undesirable outcomes could occur if payment is not secured, such as processing delays, extra fees, fines, or rejection of services.

Examples of situations where facilitation payments could arise include visa services, border checkpoints, power and utility hookups, luggage handling, customs processing, and administrative procedures.

SRP recognizes that participants may find themselves in circumstances where resisting facilitation payments is discomfiting, costly, and contrary to local norms and practice.

However, making facilitation payments exposes SRP and SRP participants to significant risks with severe consequences:

- *Legal*—potential prosecution for violating the criminal codes of jurisdictions where SRP operates, as well as the raising of legal claims for breaches of contract.
- *Reputational*—damage to SRP's credibility, brand, the reputations of its Members, and the potential dissolution of strategic partnerships.
- *Operational*—potential for recurring payments to distort local market conditions, making it difficult for SRP and other organizations to operate; further entrenchment of corruption; and the increased likelihood of extortion of SRP participants.

For these reasons, SRP strictly prohibits participants from giving or receiving facilitation payments.

Gifts and Hospitality

This Policy does not prevent SRP participants from engaging in modest and reasonable hospitality or the giving/receiving of reasonable business gifts. Hospitality and gifts can help establish friendly relations and collegiality with stakeholders and enhance SRP's image.

Nevertheless, it is essential that SRP participants who give or receive gifts and hospitality ensure that no assumption of impropriety can be drawn from such exchanges. In this sense, how gifts and hospitality could be perceived by others is just as important as the intention behind such actions.

To assist SRP participants in making appropriate decisions, the following rules shall apply:

- Giving or receiving gifts of cash or cash equivalents is strictly prohibited.
- Giving or receiving gifts or hospitality to or from any public employee, government official, elected representative, unelected politician, or political party is strictly prohibited.
- Participants may not give or accept any gift or hospitality that could influence or be perceived to influence the performance of their official duties or judgment.

- Giving or receiving gifts or hospitality shall not place any obligation upon recipients.
- Giving or receiving gifts shall not become habitual practice with certain individuals.
- Gifts and hospitality shall not be offered or received in secret.
- All gifts and hospitality shall comply with the requirements of relevant national law.
- All gifts and hospitality shall be of negligible value as determined by local custom, and the type/nature of such gifts or hospitality shall be contextually appropriate.
- It is the responsibility of all SRP participants to exercise independent judgment to determine whether the giving or receiving of gifts or hospitality could be perceived to influence, or would likely influence, how they perform their duties.
- If unsure about the propriety of a particular gift or hospitality, participants must contact their SRP supervisor or the Executive Director following guidance in the "[Reporting a Concern](#)" section of this Policy.

Registration of gifts and hospitality

It is critical for transparency and internal control purposes that SRP participants register gifts and hospitality above a certain threshold. All gifts or hospitality that have been offered, accepted, or declined with a value of €50 or more shall be logged in the SRP Gift and Hospitality Register (see Annex A). Participants may enter the Register by sending an email to hospitality@sustainablerice.org with the data requested in Annex A.

Donations

SRP e.V. and SRP Services Co. Ltd. may accept restricted and unrestricted donations to advance the mission of SRP. Donations may be financial or in-kind.

All donations shall meet the following requirements prior to SRP's acceptance:

- The donation is consistent with SRP's vision, mission, strategy, and programs.
- The donation does not violate any provision of this Policy.
- The donation is not conditional on SRP's endorsement of goods, products, projects, or services.

SRP may accept grants and donations from governments, corporations, philanthropic organizations, foundations, civil society organizations, and individuals following approval from the Executive Director.

SRP is pleased to acknowledge grantors and donors in a mutually agreeable format.

Reporting and Investigation Procedure

SRP participants shall report bribery, fraud, facilitation payments, and any other corrupt practice according to this procedure:

1. SRP participants who have suspected, observed, or participated in activity that violates this Policy shall immediately contact the Executive Director.
2. If, under the circumstances, it is not appropriate to contact the Executive Director, the participant shall contact the Board's Whistleblowing Liaison. (See the "[Contact Information](#)" section of this Policy.)
3. The participant shall be offered the option of maintaining confidentiality.
4. The Executive Director or Whistleblowing Liaison may delegate the further handling and review of the concern to an ad hoc Ombudsperson.
5. The Executive Director, Whistleblowing Liaison, or ad hoc Ombudsperson (now "reviewer") shall meet with the participant to gather more information.
6. The reviewer shall either authorize an investigation internally, enlist an external investigator, or direct the participant to an alternative SRP grievance mechanism. This decision will depend, among other factors, on the nature and seriousness of the concern and likelihood of criminality.
7. If the investigation is internal, the reviewer shall conduct an impartial, prompt, and credible investigation.
8. Any investigation must be documented thoroughly and securely, including details of the concern, parties involved, details of interviews (date, time, location, and notes), and any paper or electronic documents and other files gathered in relation to the case.
9. The reviewer, if not the Executive Director, shall submit findings to the Executive Director for information or, if applicable, decision on disciplinary measures. If the Executive Director is a party to the investigation, findings shall be submitted to the Board Chair for action pursuant to the SRP Bylaws and Board Manual.

SRP supports participants raising concerns made in good faith, even if reported concerns turn out to be inaccurate. SRP shall ensure such individuals who report suspected or actual violations of this Policy do not face discrimination or other repercussions.

Awareness, Training, and Prevention

SRP shall ensure that all participants are aware of this Policy and commit to its compliance. In particular, the Secretariat shall take the following measures:

- Contracts with new employees, consultants, and service providers require that participants read and agree to the terms of this Policy.

- This Policy informs the SRP Due Diligence Subject Questionnaire to ensure new Members and other key stakeholders with whom SRP cooperates have anti-corruption or anti-bribery policies in place.
- All Members' designated representatives, staff, consultants, and service providers must read and sign the Sustainable Rice Platform Code of Conduct. The Code sets out behaviors expected of SRP's people, including the duty to report bribery, fraud, and other corrupt practices.
- All staff are expected to complete an online anti-corruption training module, resources permitting.

Contact Information

We invite anyone who have suspected, observed, or participated in a corrupt practice in to contact one of the following focal points:

Sustainable Rice Platform

Name	Position	Email
Dr. Wyn Ellis	Executive Director	wyn.ellis@sustainablerice.org
	Whistleblowing Liaison	

Review Schedule

The SRP Board will review this Policy at least every two years and may amend the Policy at any time. The Secretariat will notify SRP Members, staff, consultants, and service providers of any future versions and will publish these versions on the SRP website at <https://www.sustainablerice.org>.

Related Documents

SRP Assurance Scheme v 2.0
 SRP Code of Conduct
 SRP Confidentiality Policy
 SRP Gift and Hospitality Register
 SRP Whistleblowing Policy

Annex A: SRP Gift and Hospitality Register

Name of SRP Participant	Date	Gift or hospitality direction	Gift or hospitality offered by/to	Description of gift or hospitality	Est. value (€)	Action (Accepted/ Declined/ Offered)
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered
		<input type="checkbox"/> For Participant <input type="checkbox"/> For Other				<input type="checkbox"/> Accepted <input type="checkbox"/> Declined <input type="checkbox"/> Offered