

# Coalition for Epidemic Preparedness Innovations

## Anti-Corruption Policy

### Objective

The purpose of this policy is to outline the behaviour and principles to support the organisation's zero tolerance against corruption, fraud and other financial irregularities. All Coalition for Epidemic Preparedness Innovations (CEPI) employees, as well as any individuals or partners working with CEPI, are held to the standards of this policy.

### Definitions

**Fraud:** Is any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.

**Corruption:** Is the offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.

**Bribe:** A gift could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

### Policy statement

CEPI has a zero-tolerance policy with regard to fraud and corruption. The discovery, reporting and documentation of acts of fraud and corruption, which are covered in more depth within the Procedures for Anti-Corruption, are established for the protection of all parties.

CEPI is committed to principles of due process in addressing allegations of fraud or corruptions. If an allegation of fraud or corruption is sustained, CEPI will take appropriate disciplinary action, up to and including termination of employment, repayment of funds, restitution of losses and securing any remedies available through legal process.

CEPI will require that its awardees and their subcontractors conduct their CEPI-funded programme according to similar principles and will abide by applicable laws and standards on fraud and corruption in the relevant territories and jurisdictions where the CEPI-funded activities are undertaken.

### CEPI is committed to the highest standards:

- No offer, gift or payment, consideration or benefit of any kind, which constitutes an illegal or corrupt practice, has been or should be made, either directly or indirectly, as an inducement or reward for the award or execution of a CEPI activity.
- CEPI employees shall not have been convicted, or be under sanction, for an offence involving bribery or corruption.
- Operations and internal control systems are operated in a way that allows early detection and prevention of corruption, fraud and other financial irregularities.

- Investors will be promptly informed should there be any indication of corruption, fraud or other financial irregularities related to the provision of its funds.
- All employees have a duty to report suspicious activity related to bribery and corruption.

<b>Current version</b>	1.0
<b>Approved by CEPI Board</b>	November 2017
<b>Owner</b>	Chief Financial Officer
<b>Flow through</b>	All awardees
<b>Linked documents</b>	Procurement Policy
<b>Past versions</b>	N/A