



**GIACC**  
Global Infrastructure Anti-Corruption Centre



**TRANSPARENCY  
INTERNATIONAL  
(UK)**

**- PACS -**

**Project Anti-Corruption System**

**(Construction Projects)**

**Template 6**

**Anti-Corruption Rules for Individuals**

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## TEMPLATE 6

***(Notes to company using the Rules:***

- (1) *Complete the information indicated in italics and then delete all italic instructions from these Rules.*
- (2) *These Rules should be printed on large sheets in a fairly large font so they can be easily read.*
- (3) *These Rules should be posted on the wall of the company's project office and in other places so that they will be frequently seen by senior officers and managers, and all employees involved in the Project.)*

### **ANTI-CORRUPTION RULES FOR INDIVIDUALS**

*[.....Insert name of Project .....]*

**All officers, managers and employees involved in the Project are required to comply with these Rules.**

**Breach of these Rules may result in the following consequences for the individual:**

- **criminal conviction, which may result in fines and/or imprisonment;**
- **civil claims for compensation;**
- **dismissal from employment or other disciplinary action.**

### **GENERAL RULES**

**Personal safety: Do not comply with these Rules if you believe that, in doing so, you will endanger your personal safety or that of another person.**

1. **Act at all times** honestly and without deception.
2. **Do not** knowingly or recklessly do any of the following, or participate in any activity which involves any of the following:
  - Offer, give, demand or accept any bribe or other improper advantage.
  - Participate in any dishonest or deceptive activity in relation to any pre-qualification, tender or nomination process.
  - Provide, conceal, or approve work, materials, equipment or services which are not of the quality and quantity required under contract.
  - Provide false, inaccurate or misleading information.
  - Dishonestly withhold information.
  - Make or submit false, inaccurate, misleading or exaggerated records, invoices, claims, applications for variations or extensions of time, or requests for payment.
  - Dishonestly refuse or fail to approve, or delay in approving, work, materials, equipment, services, invoices, claims, applications for variations or extensions of time, or requests for payment.

- Dishonestly refuse or fail to pay, or delay in paying, sums due.
- Unduly influence or interfere with the function of the Independent Assessor.

3. **Answer truthfully** all inquiries made by the Independent Assessor.

4. **Report as soon as possible to the Company's Reporting Line** any breach of these Rules, or any suspicion of Corruption. The Reporting Line is:

Name: .....  
 e-mail: .....  
 telephone: ..... .....

All reports should be made to the above person. However, if for any reason you do not wish to report to him/her, you may also report your suspicions of Corruption to the Independent Assessor whose contact details are:

Name: .....  
 e-mail: .....  
 telephone: ..... .....

**In all cases, you may report anonymously.** If you do not make your report anonymously, you may require the Company or the Independent Assessor to keep your identity confidential. The Independent Assessor has an obligation to the Project Owner, under the Independent Assessor Agreement, to keep the identity of a reporting person confidential unless the person gives written consent to such disclosure. However, it cannot be guaranteed, if you make a report, that your identity will be kept confidential.

5. **Senior officers and senior managers of the Company:** In addition to the Rules above, the senior officers and senior managers of the Company must do as follows:

- You must make proper enquiries regarding any suspicion of Corruption of which you become aware.
- You must take reasonable preventive measures to stop Corruption for which the Company may be liable.
- You must not instruct, authorise or condone, expressly or impliedly, any corrupt activity.
- You must report as soon as possible to the relevant company manager:
  - any Corruption or suspicion of Corruption,
  - any breach of the Anti-Corruption Agreement to which the Company is a party,
  - any breach of any undertakings provided by the Company's major sub-contractors, related companies and agents , and
  - any breach of these Anti-Corruption Rules.

### GIFTS, HOSPITALITY, AND DONATION RULES

1. **Do not** give or receive any of the following:

- (1) Any **gift** above a value of ..... *[Insert amount]* from or to any individual or organisation connected with the Project.
- (2) Any **hospitality** (including any meal, sporting event or other entertainment) above a value, per person, of ..... *[Insert amount]* from or to any individual or organisation connected with the Project.
- (3) Any **donation** or other benefit above a value of ..... *[Insert amount]* to any political party of the country where the Project is located.

2. **You must enter in the benefits register** details of all gifts, hospitality and donations given or received by you, to or from:

(1) any individual or organisation connected with the Project,

(2) any political party in the country where the Project is located.

These details must be entered in the Benefits Register **within seven days** of the gift, hospitality or donation being given or received.

3. **The benefits register is located** in ..... *[state location]*.