



## International Finance Facility for Immunisation (IFFIm) Gifts and Hospitality Policy Version 2.0

### DOCUMENT ADMINISTRATION

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1.0	Approved by: IFFIm Board	16 October 2018
2.0	Revised by: IFFIm Board	10 October 2024
	Next review:	As and when required

## 1 Purpose

- 1.1 The Board of Directors of International Finance Facility for Immunisation (IFFIm) Company is committed to the highest principles of probity and integrity. It is essential that in all of our dealings and behaviour we are seen to be above reproach.
- 1.2 This Policy applies to all IFFIm Board members (Directors).
- 1.3 It is the duty of Directors to ensure that they are familiar with this Policy and comply with its requirements accordingly. In the event of any doubt, they should refer to the IFFIm Board Chair or Gavi Alliance Director of Governance for guidance.

## 2 The guiding principles of the Policy

- 2.1 The guiding principles of the Board Policy are:
  - 2.1.1 The conduct of Directors should not create suspicion of any conflict between their duty to the Board and their personal interest(s);
  - 2.1.2 The actions of Directors acting in an official capacity should not give the impression to any member of the public, to any organisation with whom they deal or to their colleagues that they have been (or may have been) influenced by a benefit to show favour or disfavour to any person or organisation;
  - 2.1.3 Directors must use their own best judgement in order to conduct themselves in accordance with these guiding principles; and
  - 2.1.4 Directors must comply with their obligations under bribery and corruption laws.
- 2.2 IFFIm's general guidance regarding gifts and hospitality is as follows:
  - 2.2.1 Directors must not promise, give, or accept any gift, reward or benefit from any member of the public or organisation with whom they have been brought into contact through their duties; they must not canvass gifts or hospitality.

## 3 Bribery and corruption

- 3.1 What are Bribery and corruption?
  - 3.1.1 **Corruption** refers to behaviour lacking in honesty and integrity and particularly relates to the giving of bribes to those in power in return for corporate or personal gain.
  - 3.1.2 **Bribery** occurs when you offer, pay, seek or accept a payment, gift or favour to influence a business outcome inappropriately.

- 3.2 Bribery and corruption can be direct or indirect through third parties, vendors or joint venture partners.
- 3.3 Your obligations: Bribery and corruption laws apply to everyday situations you may encounter, for example expediting an application process or inviting a government employee to a hospitality event.

Accordingly, you must not (either directly or indirectly):

- 3.3.1 in any way be involved in the giving or receiving of a bribe, regardless of any local custom or practice and regardless of the size of the bribe;
  - 3.3.2 bribe another person intending to obtain or retain an advantage for IFFIm;
  - 3.3.3 offer, promise or give a financial or other advantage to anybody intending that he/she does something improperly for the benefit of IFFIm; or
  - 3.3.4 request or accept benefits from anyone on a scale that might be seen to create an unreasonable obligation to that party or create a conflict of interest for IFFIm.
- 3.4 IFFIm policy does not permit so-called facilitation payments to be made to governmental officials to speed up legal or administrative processes, even if such payments are nominal in amount.
  - 3.5 If you have any doubt about the propriety of a benefit under this policy or applicable law, please speak with the Gavi Alliance Director of Governance for guidance.

## 4 Gifts

- 4.1 A gift is something that is given to an individual. Directors should be aware that the general rule is that Directors should not give or receive gifts or hospitality from any party whom they have been brought into contact through their duties as a Director. This applies particularly to personal gifts offered to Directors or members of their families.
- 4.2 For gifts, the procedure is as follows:
  - 4.2.1 gifts must be isolated: “isolated” refers to timing (occasional or infrequent) and volume (one or two items rather than 100); 4.2.2 cash and cash equivalent gifts should not be promised, given, or accepted.
  - 4.2.2 an exception to the general rule about not accepting gifts is that Board members may accept gifts of a minor nature without disclosure from organisations with whom IFFIm does business. For the purpose of this policy, examples of gifts of a minor nature are considered to be:

- small promotional items that are routinely given to a wide range of people (e.g. calendars, stationery, commemorative books etc). These will usually incorporate the logo of the gift donor's organisation;
- a low value bottle of alcohol which is seen as merely a token of appreciation and is reasonable in the circumstances;
- courtesy official transport which is necessary for duties of Directors and is of a value which is not inappropriate to accept and could not be seen as creating a sense of obligation to a person. For example, plane travel will typically not be acceptable and should be declined.

## 5 Hospitality

**5.1** Particular caution should be given to any offer of hospitality where there is a possibility that a host is hoping to obtain an advantage from IFFIm as any suggestion of improper influence must be avoided. This risk may be particularly acute when large tender or procurement decisions are being made, Directors should exercise particular caution in accepting hospitality around these periods, and when in doubt, decline the offer.

**5.2** Regarding hospitality, the procedure is as follows:

- 5.2.1** Directors may be offered hospitality as part of normal business practices that is directly linked to their role at IFFIm (for example a working lunch or dinner at the end of an official engagement). This kind of conventional hospitality may be accepted as long as it is neither expensive nor lavish and it should be recorded and reported to the Director of Governance at the Gavi Alliance. The Director of Governance at the Gavi Alliance shall (pursuant to the administrative support agreement) maintain a record of such hospitality in the IFFIm gifts and hospitality register;
- 5.2.2** Refreshments provided during the course of a business meeting (coffee, tea, juice, soda, etc.) need not be disclosed;
- 5.2.3** Directors may be offered other forms of hospitality by an individual or organisation with whom they have been brought into contact through their IFFIm duties, but which are not related to their role and which are not linked to IFFIm's business. This might include, for example, substantial offers of social functions, travel, accommodation, offers of tickets and invitations to sporting, cultural, or social events or similar. These forms of hospitality should be declined without reservation, particularly if they are or might be suspected to influence the conduct or behaviour of IFFIm.

## 6 Board member responsibility

**6.1** This Board Policy entails the following responsibilities for Board members:

- 6.1.1 being aware of this policy and acting in accordance with it – in letter and spirit;
  - 6.1.2 thinking carefully when offered any gift or hospitality and exercising their own best judgement before accepting;
  - 6.1.3 keeping records of all gifts or hospitality given or offered to them, whether accepted or refused, and regardless of monetary value;
  - 6.1.4 reporting any gifts or hospitality to the Director of Governance at the Gavi Alliance as required under this Statement; and
  - 6.1.5 if there is any doubt, Directors should decline gifts or hospitality.
- 6.2 Only the Board Chair has the discretion, in his/her judgement, to agree to any exceptional dispensation of the requirements of this Policy. Where any dispensation is requested by the Board Chair, this shall be considered by a Committee of any two other directors on the Board of IFFIm. Any such dispensation permitting the exceptional departure from the requirements of this Policy shall be recorded in the IFFIm gifts and hospitality register and retained by the Gavi Alliance Director of Governance.

## **7 Raising concerns**

- 7.1 All Directors have a duty to avoid corrupt behaviour and to behave ethically. However, in addition to being accountable for personal actions, Directors must also take responsibility for reporting the inappropriate behaviour of others.
- 7.2 Any such report made will be treated entirely confidentially. Knowing about possible corrupt conduct and failing to notify the relevant person will be regarded as a serious matter. Any Director who has any concerns that corrupt conduct is going on within IFFIm or in respect of any other dealings between IFFIm and a third party, he/she must immediately raise their concerns through notifying the Gavi Alliance Director of Governance for guidance. Alternatively, Directors may raise their concerns anonymously through our confidential hotline accessible at: EthicsPoint - Gavi Alliance<sup>1</sup>.

## **8 Consequences of breach**

- 8.1 Each Director's commitment to compliance with this Policy is essential to IFFIm's efforts to conduct its business with honesty and integrity. Directors and those acting on the IFFIm's behalf may suffer consequences under applicable laws, including fines and imprisonment.

## **9 Monitoring and review**

- 9.1 IFFIm will review and update this Policy on an ongoing basis to ensure that the reputation and integrity of IFFIm is not compromised and to ensure IFFIm's continued compliance

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<sup>1</sup> Details of the EthicsPoint reporting channels are available here < <https://secure.ethicspoint.eu/domain/media/en/gui/101802/index.html>>, accessed 30 August 2024.

with anti-bribery and anti-corruption laws. IFFIm reserves the right to make changes to this policy. Compliance with the policy will be monitored by IFFIm.