

Anti-Fraud, Bribery and Corruption Policy

1. Purpose and scope

Botanic Gardens Conservation International (BGCI) has a zero-tolerance approach to fraud, bribery and corruption in all forms. As a charity working globally in plant conservation, often through field programmes, local partners and agents in countries where corruption risk can be elevated, we recognise that robust prevention, detection and response procedures are essential to protect our beneficiaries, our supporters' trust, our funding, and our reputation.

This policy applies to all trustees, employees, volunteers, consultants and contractors, and to all overseas offices, field programmes, grantees and partner organisations acting on behalf of BGCI, wherever in the world they operate.

Legal framework

This policy reflects the requirements of the Bribery Act 2010, which makes it a criminal offence to offer, give, request or accept a bribe, including through a third party, and which can hold organisations strictly liable for bribery committed on their behalf unless they can demonstrate "adequate procedures" to prevent it. It also reflects the Fraud Act 2006 and relevant provisions of the Proceeds of Crime Act 2002. This policy, together with the related due diligence and reporting procedures it references, forms part of the BGCI adequate procedures defence.

2. Definitions

- **Fraud:** any act involving dishonesty or deception carried out with the intent to gain a financial or other advantage, or to cause loss to another, including theft, false accounting, misrepresentation, and misuse of BGCI funds or assets.
- **Bribery:** offering, promising, giving, requesting or accepting a financial or other advantage to induce or reward improper performance of a function or activity, or because such an advantage has been given.
- **Corruption:** the abuse of entrusted power or position for private gain, which may include bribery but also extends to other forms of dishonest or improper conduct by those in positions of trust.
- **Facilitation payment:** a small, informal payment made to a government official to secure or speed up a routine action they are already obliged to perform (e.g. processing a permit). These are illegal under UK law even where locally customary and are prohibited under this policy without exception (see Section 6).
- **Conflict of interest:** a situation in which a person's personal interests, financial or otherwise, could improperly influence, or be perceived to influence, their judgement or actions on behalf of the BGCI.
- **Third party:** any individual or organisation BGCI deals with, including agents, intermediaries, contractors, sub-contractors, consultants, distributors, in-country partners, grantees and joint venture partners.

3. Our commitments

BGCI will:

- Maintain a zero-tolerance approach to fraud, bribery and corruption, regardless of local custom, seniority of those involved, or the size of any sum at stake.
- Conduct risk-based due diligence on overseas partners, agents, grantees and high-value suppliers before entering a relationship with them.
- Ensure no employee, volunteer or representative suffers detriment for refusing to offer or accept a bribe, or for raising a concern in good faith.
- Provide regular training on recognising and resisting bribery and corruption, particularly for staff working in, or travelling to, higher-risk jurisdictions.
- Maintain proportionate financial controls, segregation of duties, and authorisation limits to reduce opportunities for fraud.
- Investigate all credible reports of fraud, bribery or corruption thoroughly, fairly and promptly, and take appropriate disciplinary, civil or criminal action where wrongdoing is confirmed.

4. Bribery: what is and is not acceptable

Prohibited conduct - no trustee, employee, volunteer, consultant, contractor, or anyone acting on behalf of the BCGI, may:

- Offer, promise or give any payment, gift, or other advantage to any person, including a government official, to gain an improper business, regulatory or operational advantage (for example, to secure land access, research permits, export permits, or customs clearance for plant material or equipment).
- Request or accept any payment, gift, or other advantage in exchange for improperly influencing a decision made on behalf of BCGI (for example, in awarding a grant, contract, or partnership).
- Use a third party, agent or intermediary to do indirectly what they are prohibited from doing directly under this policy.

Gifts and hospitality - modest gifts and hospitality given or received as a normal and proportionate part of building working relationships are not prohibited but must always be capable of withstanding public scrutiny and must never be intended, or appear intended, to influence a decision improperly.

The following thresholds apply:

Gift / hospitality value	Action required
Under £25	May be accepted or given without prior approval but should still be noted if given/received more than occasionally from the same source.
£25–£100	Must be declared and logged in the Gifts and Hospitality Register before, or as soon as practicable after, acceptance.
Over £100	Requires prior written approval from the Director of Operations (or the Head of Finance if the Director of Operations is the recipient/giver) before acceptance or offer, in addition to being logged in the Register.
Any cash or cash equivalent (e.g. vouchers)	Must never be accepted (but can be directed as donations via the website) or offered, regardless of value.

Charitable donations and sponsorship - donations BCGI receives are governed by the Anti-Money Laundering Policy and the BCGI gift acceptance procedures. Any proposal for BCGI to make a charitable donation or

sponsorship payment to a third party (as opposed to receiving one) must be approved in advance by the Director of Operations and recorded, to ensure it is not, and cannot be perceived as, a disguised bribe.

5. Fraud prevention

BGCI maintains financial controls designed to reduce the opportunity for fraud, including segregation of duties between those who authorise, process and reconcile payments; dual authorisation for payments above approved thresholds; regular bank reconciliations; and independent annual audit. All staff with financial responsibilities are expected to always comply with these controls and must never circumvent them, even where this would be more convenient or faster.

Common fraud risks relevant to our work include - false expense claims; misuse of petty cash or field cash advances; false invoicing by suppliers or partners; payroll fraud; and diversion of grant or programme funds by overseas partners or sub-grantees. Programme and finance staff should apply particular care to cash handled in the field.

6. Higher-risk areas for our work

Overseas partners, agents and intermediaries – before entering a relationship with a new overseas partner, local agent, consultant or intermediary who will receive or manage funds, or acts on behalf of BGCI in dealings with officials, the responsible programme lead must complete a due diligence check appropriate to the level of risk. This should consider the partner's reputation, ownership and control, financial management capability, and any history of, or exposure to, corruption. Due diligence outcomes should be recorded and retained. Anti-bribery expectations, including a prohibition on facilitation payments, must be communicated clearly to partners and, where appropriate, included as a contractual term in partnership and grant agreements.

Cash handling and field payments - where field programmes require cash handling (for example, paying local labour, field assistants, or covering small operational costs in remote locations), this must follow the BGCI cash handling procedures, including pre-approved cash advance limits, receipts or other evidence for all expenditure, and regular reconciliation. Cash payments to government officials, customs officers, or other public officials, beyond normal, transparent, and properly receipted fees, are prohibited.

Facilitation payments - facilitation payments are prohibited without exception, even where they are locally customary or where a transaction may be delayed without one. Staff who are asked for, or believe they are being pressured into making, a facilitation payment should decline, document the request, and report it promptly (see Section 8). Where there is a genuine and imminent threat to personal safety, staff should prioritise their safety and report the incident as soon as it is safe to do so; this is the only circumstance in which a payment made under duress will not be treated as a breach of this policy by the individual concerned, though it must still be reported and will be reviewed.

Permits, licences and research access - BGCI conservation work often depends on permits, export licences, and access agreements involving government bodies, land authorities or local communities. Any payment connected with obtaining or renewing these must be transparent, properly invoiced or receipted, and paid through normal organisational channels. Any request for an unofficial or unreceipted payment to "help things move faster" must be refused and reported.

7. Conflicts of interest

All trustees, employees and volunteers must declare any actual or potential conflict of interest, including personal, family or financial connections to suppliers, partners, grantees or contractors. Failure to declare a known conflict may itself be treated as a breach of this policy.

8. Reporting concerns

Any trustee, employee, volunteer, consultant or contractor who suspects fraud, bribery or corruption, or who is offered, requested, or asked to make a bribe or facilitation payment, must report this promptly. Reports should be made to the Director of Operations, who acts as the BGCI designated contact for fraud, bribery and corruption matters.

Where the concern relates to, or implicates, the Director of Operations, or the reporting individual does not feel able to use the usual route, the matter should be escalated directly to the Secretary General; or the Chair of the Board of Trustees.

Full details of the reporting process, investigation procedure, escalation routes, confidentiality and whistleblower protections, and the BGCU approach to reporting serious incidents to the Charity Commission and, where relevant, law enforcement, are set out in the separate Financial Crime Reporting Procedure, which applies equally to this policy and to the Anti-Money Laundering Policy.

No one will suffer any detriment for refusing to engage in bribery or corruption, or for reporting a genuine concern in good faith, even if that concern later proves to be mistaken.

9. Roles and responsibilities

Role	Responsibility
Secretary General	Overall ownership of this policy; approves and reviews it; oversees serious incidents; ensures adequate resources for prevention and investigation.
Director of Operations	Day-to-day policy owner; receives and assesses internal reports; oversees partner due diligence and the Gifts and Hospitality Register; leads or commissions investigations.
Head of Finance	Maintains financial controls, segregation of duties and authorisation limits; supports investigations involving financial records; acts as alternative contact where the Director of Operations is conflicted.
Programme / Field Leads	Apply due diligence to local partners and agents; manage field cash handling in line with procedures; escalate concerns promptly.
All staff, volunteers and contractors	Complete required training; never offer, request or accept a bribe or facilitation payment; report concerns promptly.

10. Training and awareness

All staff will receive anti-bribery and fraud awareness training upon induction. Staff working in, or regularly travelling to, higher-risk jurisdictions, and all staff with financial, procurement, grant-management or partner-facing responsibilities, will receive more detailed training at least every two years, including practical guidance on handling facilitation payment requests.

11. Disciplinary and legal consequences

Breach of this policy by an employee may result in disciplinary action up to and including dismissal. Breach by a volunteer, consultant, contractor or partner organisation may result in termination of the relevant

agreement. Conduct that breaches this policy may also constitute a criminal offence under the Bribery Act 2010 or Fraud Act 2006, and BGCI will cooperate with law enforcement as appropriate.

12. Related Policies

- Anti-Money Laundering Policy
- Financial Crime Reporting Procedure
- Whistleblowing Policy
- Conflicts of Interest Policy
- Financial Controls and Procedures
- Partner Due Diligence Checklist
- Safeguarding Policy (where field safety and facilitation payment risk intersect)

13. Policy Review

This policy will be reviewed by the Secretary General at least every two years, or sooner if there is a significant change in the BGCI risk profile, a relevant change in law or regulation, or following any incident that highlights a gap in this policy.

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