Linpico Anti-Bribery, Corruption and Fraud Policy and Counter-Terrorism Financing, Money Laundering and Sanctions Policy

Linpico SARL

Policy Document

Linpico Anti-Bribery, Corruption and Fraud Policy and Counter-Terrorism Financing, Money Laundering and Sanctions Policy

Linpico will conduct its business honestly and without recourse to bribery, corruption, fraud or any form of financial crime. This policy sets out the standards Linpico requires and how it gives effect to them. It forms part of Linpico's compliance framework alongside the Corporate Social Responsibility Policy and is to be read together with it.

This policy applies to Linpico SARL (France) and Linpico India including project-specific offices, and to all Linpico employees and contractors, including experts, interns, volunteers, members of Linpico's management bodies, and the staff of subcontractors and consortium partners working on Linpico assignments. Acknowledgement of, and agreement to comply with, this policy forms part of each person's offer letter or contract of engagement.

Linpico will comply with the laws of the countries in which it works and with the rules and standards of the funding agencies and clients for whom the work is performed. Where these differ, the most demanding standard will apply.

Bribery, corruption and fraud

Linpico prohibits bribery and corruption in all forms. No person covered by this policy will offer, promise, give, request or accept any payment, gift, favour or advantage intended to influence a business or official decision, or capable of appearing to do so. The prohibition applies to public officials and private parties alike, to conduct through intermediaries or family members, and irrespective of local practice. Facilitation payments and kickbacks are prohibited. Linpico will not engage agents or intermediaries for the purpose of obtaining work *through the above-mentioned means.*

Linpico has no tolerance for fraud, theft, embezzlement, forgery, the falsification of records, or the misuse of client, donor or Linpico funds. Recognising that Linpico is remunerated principally on the basis of expert time, personnel will ensure that timesheets, levels of effort, mission reports and expense claims are accurate and correspond to work actually performed and costs actually incurred. Falsification of timesheets, billing the same time to more than one client, submitting unsupported or inflated expenses, and misrepresenting the qualifications or availability of proposed experts are treated as gross misconduct.

Counter-terrorism financing, money laundering and sanctions

Linpico will not make funds, assets or resources available, directly or indirectly, to any person or entity subject to applicable sanctions or designated in connection with terrorism; and will not participate in any arrangement designed to conceal the origin or destination of funds derived from criminal conduct.

Before entering into a contract, subcontract, consortium agreement, expert engagement or supplier relationship of material value, Linpico will screen the counterparty against the United Nations and European Union sanctions lists and the debarment lists of the funding agencies with which it works. Screening will be recorded and repeated at least annually for continuing relationships. Where a potential match arises, the relationship or payment will be suspended and referred to the Compliance Focal Point before any further step is taken.

Linpico will receive and make payments only through its own bank accounts and only to or from the account of the contracting counterparty. Linpico will not use cash other than for minor documented expenditure, will not pay or accept payment through unrelated third parties or unconnected jurisdictions, and will not invoice for services not performed. Personnel will report without delay any request or circumstance inconsistent with these controls, and will not discuss such a report with the counterparty.

Reporting, investigation and consequences

Any person who becomes aware of conduct that breaches or may breach this policy must report it without delay, to the Managing Director. Reports may be made in confidence, and Linpico will protect the identity of the person reporting so far as is possible whilst properly examining the matter. It is not the role of the person reporting to investigate or to establish whether the concern is well-founded. Failure to report a known or suspected breach is itself a breach of this policy.

Linpico will assess every report promptly and investigate where warranted, using an investigator independent of the matter. Linpico will protect from retaliation any person who reports a concern in good faith, whether or not it is substantiated, and retaliation will itself be treated as gross misconduct.

Breaches may result in disciplinary action up to and including dismissal or termination of contract, the withholding of payment, termination of a subcontract, referral to the competent national authorities, and notification to the affected client or funding agency. Linpico will cooperate fully with any investigation or audit conducted by a client, funding agency or competent authority.

Responsibilities, training and review

The Managing Director holds overall accountability for this policy, including counterparty screening, the receipt of declarations and reports, and arranging training. Project directors and project managers are responsible for applying this policy on their assignments and for briefing their teams before deployment.

Linpico will brief every person covered by this policy on its requirements at the point of engagement and will provide periodic refresher training covering improper payments, gifts and hospitality, fraud and the integrity of timesheets and claims, counterparty screening, sanctions and terrorism financing, and how to report a concern. Training will be provided in a language and format accessible to the participants, including field-based and locally engaged staff.

Linpico will review this policy at least every two years, and following any substantiated breach or material change in its operations or in applicable requirements.