



ETHICS, ANTI-BRIBERY & ANTI-CORRUPTION POLICY

As approved at the GFF Council on August 6, 2022



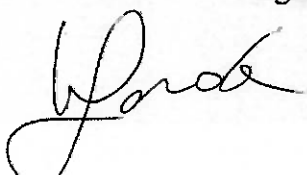
**Guyana Football Federation
17 Dadanawa Street Section 'K', Campbellville, Georgetown, Guyana, South America.**

The Guyana Football Federation (GFF) is the governing body of football in Guyana. It is a member of the International Football Federation (FIFA) and the Confederation of North, Central America and Caribbean Association Football (CONCACAF). Among the objectives of the GFF is the promotion and practice of the highest standards of integrity, ethics and fair play with a view to preventing all methods or practices such as corruption, fraud, nepotism, doping or match manipulation which can cause damage and harm to the reputation of GFF, FIFA, Directors and Officers of the GFF, its Officials, Members and Players, the game of football, and the integrity of matches and competitions held under the auspices of the GFF.

With a view towards these broad objectives, the Guyana Football Federation has adopted this **Ethics, Anti-Bribery & Anti-Corruption Policy** to be observed by the Guyana Football Federation, its Directors, its officers, members, all other persons acting on behalf of the GFF, its member bodies and suppliers of goods and services to the GFF.

1. Policy statement

- 1.1. The GFF is committed to a zero-tolerance for bribery and corrupt activities, to conducting its activities in an ethical and honest manner, and to implement and enforce systems that ensure that bribery, corruption and other forms of improper practices are prevented.
- 1.2. The GFF will uphold all laws relating to anti-bribery and corruption. The GFF, its directors, officers, members, affiliates and representatives will observe all such laws of Guyana in the exercise of their functions on behalf of or in connection with football, both at home and abroad. Additionally, through its membership of FIFA and CONCACAF, the GFF considers itself bound to adhere to any Ethics Code of those bodies.
- 1.3. The GFF recognizes that under Guyana's laws, bribery and corruption are punishable by imprisonment and fines. If GFF, its directors, officers, members, affiliates and representatives of our organisation are discovered to have taken part in corrupt activities, the GFF may be subject to fines and penalties as well as exclusion by international, regional and national bodies.



2. Definition of bribery

- 2.1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.
- 2.2. A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.
- 2.3. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
- 2.4. Bribery is illegal and is a crime under the Criminal Law Offences Act of Guyana, carrying jail time on conviction. Directors, Officers, Employees, Representatives and suppliers of goods and services to the GFF must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the GFF.

3. Guidance

3.1. Gifts and Hospitality

The GFF recognizes as normal and appropriate gestures of hospitality and goodwill(whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.



- d. It is given in the name of the company/organisation, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g., a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a monetary value of G\$10,000.
- k. It is not offered to, or accepted from, a government official or representative or politician or political party.

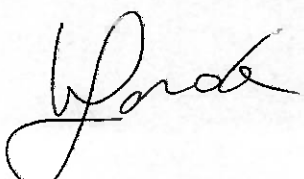
3.1.1. Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Secretariat lead and/or the GFF Council, who will assess the circumstances.

As good practice, gifts given and received should always be disclosed to the Secretariat.

The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Secretariat lead should be sought.

3.2. Facilitation Payments and Kickbacks

3.2.1. GFF does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.



3.2.2. GFF does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

3.2.3. GFF recognises that, despite its strict policy on facilitation payments and kickbacks, officers and employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- a. Keep any amount to the minimum.
- b. Ask for a receipt, detailing the amount and reason for the payment.
- c. Create a record concerning the payment.
- d. Report this incident to the GFF Council.

3.3. Political Contributions

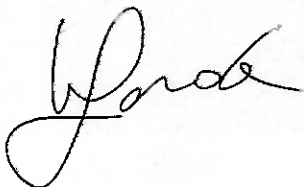
3.3.1. GFF will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

3.4. Charitable Contributions

3.4.1. GFF accepts and encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – but is required to disclose all such contributions on its website, periodic and annual reports and its annual financial statements.

3.4.2. Employees and contractors must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

3.4.3. The GFF will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the GFF Council.



4. Employee and contractor responsibilities

- 4.1. Employees and contractors of GFF must read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.
- 4.2. All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.
- 4.3. If any person has any reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, such a person shall notify the Secretariat as soon as possible.
- 4.4. Any person who suspects that there is an instance of bribery or corrupt activities occurring in relation to GFF, is encouraged to raise their concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour may be in breach of this Policy, you should contact the Secretariat or any of its officers.
- 4.5 You must inform the Secretariat of the GFF 'as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are or may become a victim of any corrupt activity.
- 4.6 The GFF reserves the right to terminate a contractual relationship with a contractor if they breach this anti-bribery policy.

5. Protection

- 5.1. G F F will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

5.2. Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the report made by any person.

5.3. Any person who has reason to believe that he or she has been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, should inform the Secretariat immediately.

6. Record keeping

6.1. G F F will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. It will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to Secretariat and GFF Council review.

7. Investigations into Complaints

The bodies and the rules of the Guyana Football Federation governing complaints, investigations and discipline are set out in section L of the Constitution.

The rules of natural justice shall apply to all complaints, and the individual against whom a complaint is made shall be provided with copies of all such complaints and given adequate opportunity to defend himself-herself against the charges and to confront the accuser.

Conflicts of Interests

Decisions made by any director, officer or official of the Guyana Football Federation must not be tainted or compromised by personal interest, popularly referred to as a conflict of interest. One of the most authoritative definitions of conflict of interest is that by the Organisation for Economic Co-operation and Development:

"Conflict of interest occurs when an individual or a corporation (either private or governmental) is in a position to exploit his or their own professional or official capacity in some way for personal or corporate benefit."



Every director, officer or official has a duty to ensure that his or her decisions are in the best interests of the Federation, and is not tainted and does not bring the GFF into disrepute. Conflicts of interest and duty are interrelated concepts. A conflict of interest is any situation that puts a director in a position to abuse their role for personal or business gain. A conflict of duty, on the other hand, is a conflict between two different legal or ethical duties.

The GFF has decided to address such conflicts by two independent means, the first being the establishment and operation of a REGISTER OF INTERESTS and the DECLARATION OF INTEREST AND RECUSAL

A. REGISTER OF INTERESTS

PURPOSE OF THE REGISTER

1. The aim is to identify those activities and interests which the Guyana Football Federation and its members consider they should volunteer into the public domain because those interests might be interpreted as carrying a risk of bias in the conduct of the person's duties and responsibilities to the GFF.

MAIN CHARACTERISTICS OF THE REGISTER

2. The Register is a deliberate mix of voluntary and compulsory. Whether a person is in the compulsory or voluntary section, they would only have to declare relevant interests i.e., in their judgement, as impartially as possible, interests relevant to their GFF duties.

THE NEED TO REGISTER

3. The Register is categorised into two parts. Members of the groups listed under Part A must complete the form and submit it to the Secretariat and Treasurer. Members of Part B may register only if they have a relevant interest to declare and submit it to the Secretariat and Treasurer.

4. Part A: Compulsory registration - those who must file an entry even if they have no interest to declare:

- President, Vice- Presidents, General Secretary, Treasurer, elected and appointed members of the GFF Council
- Chairman of standing committees
- Employees at management or supervisory level who are frequently involved in the procurement process

5. Part B: Voluntary registration - other persons who are invited to file an entry on the Register, but need do so only if they have a relevant interest to declare:

- Other Managers and Supervisors

- Freelancers / Contractors / third party representatives
- Other volunteers

HOW TO DECIDE IF AN INTEREST IS RELEVANT

6. An interest need only be declared if the individual considers it relevant to their GFF duties and that there is therefore a risk of it being reasonably perceived as biasing their decisions while conducting those GFF duties. Relevance to GFF duties includes any interests that are relevant to any entities and undertakings that come within the GFF's mandate.

7. As far as possible there should be a distinction between the criteria for declaring an interest and the fact that declaring an interest is a personal decision. The following notes are therefore designed to assist those making entries on the Register to decide as impartially as possible whether to record an interest:

- always bear in mind the following test: whether "an external observer, knowing the facts of the situation, would reasonably think that the person might be influenced by the interest"; the form for registration will have headed columns for the type of interest to be registered, thus providing a framework for deciding what to register;
- the presumption is always in favour of declaring an interest: if a person is in doubt whether to register an interest, that means they should register it;
- those who are still in doubt can approach the President or Treasurer for guidance about whether to declare a particular interest or not;
- failure to declare an interest will render the individual subject to investigation as in section 16 below as well as further sanctions including suspension or dismissal.

TYPES OF INTEREST TO BE REGISTERED

8. The exact nature of the interest will vary according to personal circumstances but the following are examples of interests which should be declared:

- company or related undertakings: any relationship with a named company or related undertaking. Such interests would include:
 - ownership or part ownership;
 - share-holdings or other beneficial interest such as options etc.
 - directorships;
 - paid employment, specifying position held;
 - partnership, consultancy, or close family connection.
 - self-employment: names of any relevant clients;
 - property: ownership of any properties in which the GFF or any entities and undertakings that come within the GFF's mandate might have an interest;
 - charities: trusteeship or governorship of or employment with, any charities or voluntary organisations;
 - public appointments: paid or unpaid;
 - memberships: membership of professional bodies, trade or other association, or external bodies;
 - close family links: specified close family interest in any of the above. The definition

- of
- "close" at a minimum meets the related parties definition in IPSAS 20. This will include:
- a spouse, domestic partner, dependent child, or relative living in a common household;
- a grandparent, parent, nondependent child, grandchild, brother, or sister; and
- the spouse or domestic partner of a child, a parent in law, a brother in law, or a sister in law.

9. In all of the above, registrants are not expected to quantify the extent of a financial interest, merely the fact that one exists.

FORM OF REGISTRATION

10. The information on the GFF Register consists of the following pro forma for each person registering:

- Name
- GFF official position held
- Declaration of the nature of any possible conflict of interest
- Date and signature of the registrant

INSPECTION OF THE REGISTER

11. The Register of Interest is open to public inspection and subject to inspection by GFF auditors during office hours only. The Register is held by the GFF's Treasurer and will be made available for review by appointment only.

12. The GFF will not use information provided on the form for any other purpose than the Register, and to declare interests.

PROACTIVE DISCLOSURE

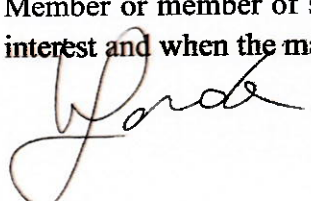
13. The declarations of the GFF's Council may be made available on the GFF's website as well as shared with the audit team conducting the FIFA Central Audit Review Annually.

UPDATING OF REGISTER ENTRIES

14. The Register is updated annually at the beginning of the calendar year. The information to use is that which is current at the time of filling in the pro forma. Those who register are expected to update their entry whenever any relevant change of personal circumstances occurs.

DECLARATIONS AT MEETINGS

15. At the commencement of any meeting, if there is a matter to be discussed that a Council Member or member of staff has a relevant interest in they are required to declare the conflict of interest and when the matter is discussed leave the meeting.




UNDECLARED CONFLICT OF INTEREST

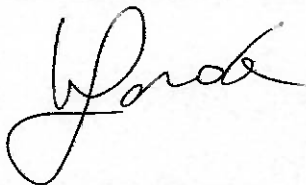
16. Any failure to declare a relevant interest may be investigated by the Audit and Compliance Committee or Council of the GFF, and/or FIFA Audit & Compliance Committee or GFF's external auditors, and for GFF employees this will be dealt with in line with the disciplinary procedures contained within the GFF HR Management Policies and Procedures.

Period:

Name:

Official Position:

Registerable interest	Description of interest	Entry (please state NONE where applicable)
Company or related undertakings	<p>Any relationship with a named company or related undertaking. Such interests would include:</p> <ul style="list-style-type: none">• ownership or part ownership;• share-holdings or other beneficial interest such as options etc.• directorships;• paid employment, specifying position held;• partnership, consultancy, or close family connection.	
Self-employment	Names of entity and any relevant clients that could be related to the MA.	
Property	Ownership of any properties in which the GFF or any entities and undertakings that come within the GFF's mandate might have an interest	



Charities	Trusteeship or governorship of or employment with any charities or voluntary organisations	
Public appointments	Public appointments, paid or unpaid	
Memberships		

Registerable interest	Description of interest	Entry (please state NONE where applicable)
	Membership of professional bodies, trade or other association, or external bodies	
Close family links	<p>Specified close family interest in any of the above. The definition of "close" at a minimum meets the related parties definition in IPSAS 20. This will include:</p> <ul style="list-style-type: none"> • a spouse, domestic partner, dependent child, or relative living in a common household; • a grandparent, parent, nondependent child, grandchild, brother, or sister; and • the spouse or domestic partner of a child, a parent in law, a brother in law, or a sister in law. 	
Other interests	Anything not covered by the above categories	

Handwritten signature

JA

I confirm that the above declaration is complete and correct to the best of my knowledge and belief.

Signature:

Date:

The GFF will not use information provided on this form for any other purpose than the Register and to declare interests. Please complete and return this form annually to the Treasurer/Chief Financial Officer, no later than 31 January of the relevant calendar year.

DECLARATION OF INTEREST AND RECUSAL

Any person who is faced with a situation of a Conflict of Interest or a Conflict of Duty must immediately notify that fact to his/her supervisor. In the case of the President, notification shall be to the Board via the Secretary.

The GFF takes a non-negotiable, absolute line where a conflict arises. The person concerned must voluntarily withdraw and if the person fails to do so, the person shall not be permitted to continue functioning in the matter.

Georgetown, 3rd October, 2022

Place and Date

I Alves

Rev. Ian Alves

General Secretary

W. Forde

Mr. Wayne S. Forde

President