

Ethics and Compliance

The Centre for Local Business Development (the Centre) holds itself accountable to the U.K. Bribery Act (UKBA) across all projects and activities. Our staff avoids any activity that would breach the U.S. Foreign Corrupt Practices Act (FCPA), the UKBA, local law, or international standards of ethics best practice. Our staff is responsible for assisting with preventing bribery and corruption. The Centre advances its unified approach to ethics and compliance through the integration of the following key principles:

- **Bribery.** We do not directly, or indirectly, solicit, accept, offer, promise, or give a bribe or other improper payment, gift, favor, or hospitality to obtain or retain business, approvals, or other improper business advantage.
- **Facilitation Payments.** We do not make small payments to “grease” approvals or actions on the part of government officials. Facilitation payments are prohibited under the UKBA. Under certain circumstances, DAI/the Centre may pay for the commercial services of an expeditor to process goods through customs. The terms of reference in the associated contract must be explicit and must prohibit payments to “grease” approvals on the part of a government official.
- **Kickbacks.** We never ask for or accept anything of value from vendors, suppliers, or contractors who do business with DAI or the Centre. Our staff may accept gifts and hospitality of nominal value (a meal offered during the course of a business meeting, for example, or a notepad with an organization’s logo on it).
- **Gratuities.** We never pay or provide gifts, favors, or hospitality to a government official after receiving a favorable action or decision.
- **Contributions.** We do not make contributions to candidates for public office or to political parties or other political organizations on behalf of DAI or the Centre. Personal contributions by our staff are permissible.
- **Hospitality, Nominal Gifts, and Honoraria.** DAI or Centre-approved advertising items of nominal value (pens, hats, t-shirts, stationary, and other business-related items), plaques, and certificates of recognition may be offered to government officials. Modest meals, refreshments, and non-alcoholic beverages in accordance are also allowed. However, in no event should the value of the courtesy exceed \$20 per person/per occasion or \$50 per person annually. Honoraria to government officials must be nominal and occasional for work outside normal duties and working hours to avoid conflicts with official duties.
- **Awareness.** We promote training and practices that raise awareness among our business partners of the global fight against bribery and corruption.

For additional information: <https://www.dai.com/who-we-are/ethics-integrity>