

2023

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



GUYANA GOLD BOARD

6/30/2023

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1. Purpose

The purpose of this Anti-Bribery and Anti-Corruption Policy (the "Policy") is to establish controls to ensure compliance with all applicable anti-bribery and anti-corruption laws and to ensure that the Guyana Gold Board's (GGB) business is conducted in a socially responsible manner.

2. What does the Policy cover?

- a. This Policy exists to set out the responsibilities of Guyana Gold Board and its employees in regard to observing and upholding its zero-tolerance position on bribery and corruption.
- b. It also exists to act as a source of information and guidance for those working for the Guyana Gold Board. It will help them to recognize and deal with bribery and corruption issues, as well as understand their responsibilities.

3. Policy Statement

- a. GGB is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. GGB has a zero-tolerance for bribery and corrupt activities. GGB is committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.
- b. Guyana Gold Board will constantly uphold all laws relating to anti-bribery and anti-corruption in Guyana. GGB and all its employees are bound by the laws of Guyana, including the **Integrity Commission Act Chapter 19:12** and the **Criminal Law (Offences) Act Chapter 8:01**, in regard to their conduct in carrying out the work of the state and the organisation.
- c. GGB recognises that bribery and corruption is considered a misdemeanor and is punishable by up to three (3) years of imprisonment under **section 333 to 338 of the**

Criminal Law (Offences) Act Chapter 8:01. It is with this in mind that GGB commits to preventing bribery and corruption in its business and takes its legal responsibilities seriously.

4. Scope

Who is covered by the Policy?

- a.** In this policy, third party means any individual or organisation you come into contact with during the course of your work for GGB, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents (licensed gold dealers), miners, traders, goldsmiths/jewelers, advisors and government and public bodies, including their advisors, representatives, and officials, politicians and political parties.
- b.** This anti-bribery and anti-corruption policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, casual workers, agency staff, interns, agents, sponsors, or any other person or persons associated with GGB (including third parties), or any of its branches or their employees (collectively referred to as employees in this policy), no matter where they are located. The policy also applies to Managers, Supervisors, Board of Directors and/or Committee members at any level.
- c.** Any arrangements GGB makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with at a minimum.

5. Definitions and Interpretations

- ❖ **"Bribery"** – refers to the act, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision. It also refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

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. Bribery is illegal. Employees 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 Board's General Manager.

- ❖ **"Corruption"**- Transparency International defines corruption as the abuse of entrusted power for private gain.
- ❖ **"Person in Public Life"** - Section 1 of the Integrity Commission Act defines a person in public life as a person who holds any specified office and includes a person stated in section 42 of the Integrity Commission Act whether or not mentioned in Schedule I of the Integrity Commission Act.
- ❖ **"Public Servant"-means-** According to Art 232 of the Constitution of Guyana Chapter 1:01, public servant means the service of the Government of Guyana in a civil capacity.

6. Offences related to Bribery and Corruption

A. Offences under the Criminal Law (Offences) Act Chapter 8:01

- i. Section 338 (2) (a) of the Criminal Law (Offences) Act Chapter 8:01 provides that if any person being an agent, corruptly accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person¹, any gift or consideration as an inducement or reward for doing or forbearing to do, or for having after the enactment of this section done or forborne to do, any act in relation to his principal's affairs or business, or for showing or forbearing to show favour or disfavour to any person in relation to his principal's affairs or business; he shall be guilty of a misdemeanour and liable on conviction on indictment to a fine of three hundred and ninety thousand dollars and to imprisonment for two years, or, where the matter or transaction in relation to which the offence was committed was a contract with the State, or any government department, or any public body, or a subcontract to execute any work comprised in such a contract, to imprisonment for seven years.
- ii. Section 338 (3) of the Criminal Law Offences Act Chapter 8:01 provides that where in any proceedings under this section it is proved that any money, gift, or other consideration, has been paid or given to or received by a person in the employment of the state or any government department or public body, the money, gift or consideration shall be deemed to have been paid or given and received corruptly as the inducement or reward mentioned in this section unless the contrary is proved.
- iii. Section 334 of the Criminal Law Offences Act provides that everyone who, being or expecting to be a public servant, accepts, or obtains, or agrees to accept, or attempts to obtain, from any person, for himself or for any other person, any gratification whatever, whether pecuniary or otherwise, other than legal remuneration, as a motive or reward for doing or forbearing to do any official act, or for showing or forbearing to show, in the exercise of his official functions, favour or disfavour to any person, or for rendering or attempting to render any service or disservice to any person with the legislative or executive government of Guyana or with any public servant as a public servant, shall be guilty of a misdemeanour and liable to imprisonment for three years.

¹ The Interpretation and General Clauses Act includes in the definition of "person" anybody of persons corporate or unincorporated [Section 5(1)].

- iv.** Section 335 of the Criminal Law Offences Act Chapter 8:01 provides that everyone who accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification whatever, whether pecuniary or otherwise, as a motive or reward for inducing, by corrupt or illegal means, any public servant to do or to forbear to do any official act, or, in the exercise of his official functions, to show favour or disfavour to any person or to render any service or disservice to any person with the National Assembly, or the executive government of Guyana, or with any public servant, as a public servant, shall be guilty of a misdemeanour and liable to imprisonment for three years.
- v.** Section 337 of the Criminal Law Offences Act Chapter 8:01 provides that every person who, being a public servant in respect of whom either of the offences defined in the last two preceding sections¹⁶ is committed, abets the offence, shall be guilty of misdemeanour and liable to imprisonment for three years.

B. Offences under the Integrity Commission Act Chapter 19:12

- i.** Section 27 (1) of the Integrity Commission Act Chapter 19:12 established a Code of Conduct, being a body of rules contained in Schedule II of the Act, for every person in public life.
- ii.** Section 27 (2) of the Integrity Commission Act Chapter 19:12, provides that any person in public life who is in breach of any provision of the Code of Conduct shall be liable, on summary conviction, to a fine of twenty-five thousand dollars (\$25,000) and to imprisonment for a period of not less than six (6) months nor more than one (1) year. The provisions of the **Code of Conduct** is outlined in **Schedule "A"**.
- iii.** Section 41 of the Integrity Commission Act Chapter 19:12 provides that where a person who is or was a person in public life, or any other person on his behalf, is found to be in possession of property or pecuniary resource disproportionate to the known sources of income of the first mentioned person, and that person fails to produce satisfactory evidence to prove that the possession of the property or pecuniary resource was acquired by lawful means, he shall be guilty of an offence and shall be liable, on summary conviction, to a fine and to imprisonment for a term of not less than six months nor more than three years.

7. What is and What is NOT Acceptable

This policy covers:

- Bribes
- Extortion
- Gifts and Hospitality
- Facilitation Payments
- Political Contributions
- Charitable Contributions

A. Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not receive a bribe from any person.

B. Extortion

Employees must not directly or indirectly demand or accept a bribe, facilitation payment or kickback or other payment by any means, including without limitation threat of force, intimidation or exercise of authority.

C. Gifts and Hospitality

1. Guyana Gold Board accepts normal and appropriate gestures of hospitality and goodwill (whether received from/ given to third parties) so long as the receiving or giving of gifts meets the following requirements:
 - i. 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.
 - ii. It is not made with the suggestion that a return favour is expected.
 - iii. It is in compliance with the laws of Guyana specifically the Integrity Commission Act Chapter 19:12 and the Code of Conduct.

- iv.** It is given in the name of the company, not in an individual's name.
 - v.** It does not include cash or a cash equivalent (*e.g.*, a voucher or gift certificate) **amounting to** more than Ten Thousand Dollars (GYD\$ 10,000).
 - vi.** It is appropriate for the circumstances (*e.g.*, giving small gifts around Christmas or as a small thank you from a customer or a company for helping with a large project upon completion).
 - vii.** It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
 - viii.** It is given/received openly, not secretly.
 - ix.** It is not selectively given to a key, influential person such as a manager or supervisor, clearly with the intention of directly influencing them.
 - x.** It is not offered to, or accepted from, a government official or representative or politician, political party, a licensed gold dealer, licensed gold trader or any customer of GGB without the prior approval of GGB's General Manager.
2. 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 General Manager, who will assess the circumstances with the input of the Compliance Manager. **(See Schedule "B" for the Gift Declaration Form.)**
3. Where the gift is in excess of ten thousand dollars GYD \$10,000 and was offered to a person in public life (in this instance, a Manager or Head of Department), the procedure outlined under **section 32 of the Integrity Commission Act Chapter 19:12** must be followed. Section 32 provides that every person in public life who receives a gift worth more than ten thousand dollars (GYD \$10,000) shall make a report of that fact to the Integrity Commission stating the name and address of the donor, the description and approximate value of such gift and whether, in the opinion of the donee, the gift is a personal gift or a State gift. Additionally, see **Schedule "A"** for the Code of Conduct which governs the conduct of persons in public life.

4. Guyana Gold Board recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.
5. As good practice, gifts given and received should always be disclosed to the General Manager and in her absence, the Compliance Manager. Gifts from suppliers should always be disclosed.
6. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Compliance Manager should be sought.

D. Facilitation Payments and Kickbacks

- i. Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low officials to obtain a level of service which one would normally be entitled to.
- ii. GGB's strict policy is that facilitation payments must not be made, demanded or accepted by any of its employees. GGB recognises that kickbacks are typically made in exchange for a business favour or advantage.
- iii. GGB also recognises that, despite its strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their or their family's personal security at risk. Under these circumstances, the following steps must be taken:
 - Keep any amount to the minimum.
 - Ask for a receipt detailing the amount and reason for the payment.
 - Create a record concerning the payment.
 - The employee should report the incident to his/her line manager who will then forward the report to the General Manager using the **Gift Declaration Form** in **Schedule "B"**.

E. Political Contributions

Guyana Gold Board 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.

F. Charitable Contributions

- i. Guyana Gold Board accepts (and indeed encourages) the act of donating to charities—whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.
- ii. GGB must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.
- iii. GGB will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/received without the approval of the General Manager.

8. Employee Responsibilities

- a. As an employee of Guyana Gold Board, you must ensure that you 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.
- b. All employees and those under GGB's 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 and Anti-Corruption Policy.
- c. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the General Manager and in her absence the Compliance Manager.
- d. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The General Manager with the approval of the Board

of Directors has the right to terminate a contractual relationship with an employee if they breach this Anti-Bribery and Anti-Corruption Policy.

9. What happens if I need to raise a concern?

This section of the policy covers 3 areas:

- i. Reporting of Concerns or Whistleblowing.
- ii. What to do if you are a victim of bribery or corruption.
- iii. Protection.

A. Reporting of Concerns or Whistleblowing

If an employee suspect that there is an instance of bribery or corrupt activities occurring in relation to Guyana Gold Board, you are encouraged to raise your concerns at as early a stage as possible. If you are uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to your line manager, the Compliance Manager or the General Manager.

GGB will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

B. What to do if you are a victim of bribery or corruption

You must report the incident to the Compliance Manager 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 a victim of another corrupt activity.

Reports can be made using the **ANONYMOUS REPORT FORM** found online at <https://ggb.gov.gy/anonymous-report/>. The form can be found on GGB's website ggb.gov.gy. Reporters can also upload documentary evidence as part of their anonymous reports.

C. Protection

- i. If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, Guyana Gold Board understands that you may feel worried about potential repercussions. Guyana Gold Board will

support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

- ii. Guyana Gold Board 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.
- iii. Detrimental treatment refers to dismissal, disciplinary action, threats, or unfavourable treatment in relation to the concern the individual raised.
- iv. If you have reason to believe you have been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager, Compliance Manager or the General Manger immediately.

10. Reporting Violations

A. If an employee becomes aware of or genuinely suspects that an action would constitute a violation of this Policy, they must raise their concern at the earliest possible stage.

B. The employee should choose the most appropriate route to report their concern or suspicion:

- i. their Immediate Supervisor;
- ii. their Department Manager;
- iii. the Compliance Manager; or
- iv. the General Manager ;

and in the case of directors, consultants and contractors, to the Compliance Manager OR the General Manager. If an individual is not comfortable discussing the matter with their immediate supervisor, or does not believe that such supervisor has dealt with the matter properly, then the individual should raise the matter with the General Manager.

C. Any person who raises genuine concerns will not be subject to any retribution or disciplinary action.

- D.** All concerns regarding bribery or corruption, acts of dishonesty or any other malpractices will be investigated thoroughly and dealt with in line with this Policy, GGB's Human Resources Manual and Disciplinary Code and the Integrity Commission Act Chapter 19:12.

11. Consequences of Non-Compliance

- a.** Failure to comply with this Policy may result in severe consequences, including internal disciplinary action or termination of any employment, consulting or similar arrangement without notice.
- b.** The violation of this Policy may also violate certain laws and if it appears that an employee may have violated such laws, then GGB may refer the matter to the appropriate regulatory or enforcement authorities, which could lead to penalties such as fines or imprisonment.
- c.** The violation of this Policy may constitute a criminal offence under certain statutes, including but not limited to the Criminal Law (Offences) Act and may expose the violator to fines and/or imprisonment.

12. Training and communication

- A.** Guyana Gold Board will provide training on this Policy as part of the induction process for new employees. Employees will also receive regular, relevant training on how to adhere to this Policy, and will be asked annually to formally accept that they will comply with this policy.
- B.** Guyana Gold Board's Anti-Bribery and Anti-Corruption Policy and a zero-tolerance attitude will be clearly communicated to all clients and customers, suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.
- C.** Guyana Gold Board will provide relevant anti-bribery and corruption training to employees etc. where there is need to enhance employees' knowledge of how to comply with the Integrity Commission Act or Criminal Law Offences Act. As good practice, all of GGB's employees will be provided with anti-bribery and anti-corruption training where there is a potential risk of facing bribery or corruption during work activities.

13. Addressing Red Flags

- A.** It is important not only to avoid bribery and corruption, but also to avoid ignoring signs of bribery and corruption. Ignoring “red flags” can create significant legal and business risks for GGB and, depending on the nature and seriousness of what was ignored, can lead to legal liability or penalties and may result in disciplinary measures being imposed on a manager/ supervisor by management of GGB.
- B.** If something about a transaction, business arrangement, or request from a third party “looks bad” or “smells funny”, each manager/supervisor is expected to ask questions and, where reassuring answers are not forthcoming, promptly refer the matter to the Compliance Manager for review and guidance. For a non-exhaustive list of examples of “red flags” refer to **Schedule “D”** to this Policy.

14. Record keeping

Guyana Gold Board will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. GGB 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 managerial/board review.

15. Monitoring and reviewing

- A.** Guyana Gold Board’s Compliance Manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. The Compliance Manager will assess its suitability, adequacy, and effectiveness.
- B.** Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
- C.** Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how

it may be improved. Feedback of this nature should be addressed to the Compliance Manager.

- D. This policy does not form part of an employee's contract of employment and Guyana Gold Board may amend it at any time so to improve its effectiveness at combatting bribery and corruption.

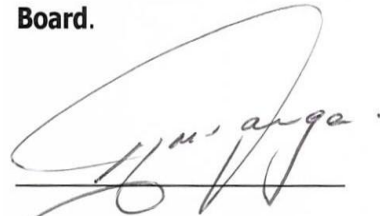
16. Queries

If you have any questions about how this Policy should be followed in a particular case, please contact the Compliance Manager or General Manager.

17. Certification

It is the responsibility of all employees, to understand and comply with this Policy. Upon receipt of this Policy, each employee is required to complete the Receipt and Acknowledgement attached as **Schedule "E"** to this Policy.

Signed on the 12th day of July, 2023 for and behalf of Guyana Gold Board.



Dr. Gobind Ganga
Chairman of the Board of Directors



Eondrene Thompson
General Manager

Schedule "A"- Code of Conduct, Schedule II of the Integrity Commission Act

Order No. 10 of 2017

Made Under

The Integrity Commission Act Cap 26:01

In observance of the Code of Conduct these are the guiding principles.

The Ten Principles of Public Life

Accountability: A person in public life shall be accountable to the public for his or her decisions and actions and shall submit himself or herself to scrutiny and criticism.

Dignity: A person in public life shall, in the execution of his or her official functions, conduct themselves in a manner which engenders the respect of their peers and the public.

Diligence: A person in public life is expected to be effective, efficient and reliable in the performance of their duties.

Duty: A person in public life owes a duty to the public and shall consider themselves servants of the people.

Honour: Members of Parliament shall regard it as an honour to serve in the nation's highest legislative forum. They have a moral responsibility to preserve the reputation of their office.

Integrity: A person in public life and members of his family shall upon the assumptions of office declare their private interests relating to the duties of the public official and assets as required by the Integrity Commission Act and any other law.

Loyalty: A person in public life shall display allegiance to the State and shall demonstrate concern for the well-being of the people of Guyana.

Objectivity: A person in public life, in executing public business shall make decisions based on merit when making public appointment, awarding contracts, or recommending individuals for reward and benefits.

Responsibility: A person in public life shall have a basic responsibility to take decisions solely in the national interest without any benefit of personal gain, or material benefit for themselves, their family, friends and associates.

Transparency: A person in public life shall exercise his or her public decisions and actions with full and frank disclosure and shall provide when demanded by the public an explanation for his or her actions and decisions.

Article 1

Bribes

No person in public life shall in return for anything done or to be done, or omitted to be done in the execution of his or her duties, ask for or accept for himself or any person, any money, property, benefit or favour of any kind over and above that which he or she is lawfully entitled to receive for the performance of his duties.

Article 2

Discrimination

No person in public life shall in the course of the performance of his or her official functions discriminate against any person with respect to terms, conditions and privileges of employment or other official matters because of such person's race, place of origin, political opinions, colour, creed, age, disability, marital status, sex, gender, language, birth, social class, pregnancy, religion, belief or culture.

Article 3

Gifts

No person in public life shall for himself or herself or for anyone else accept any gift, benefit, or advantage from any one, save personal gifts from a relative or friend, or personal gifts given otherwise than as a motive or reward for doing or forbearing to do anything in the performance of his official functions or causing any other person from doing or forbearing to do anything:

Provided that this provision shall not apply to gifts received on behalf of the State by any person in public life in the course of the performance of his or her official functions.

Article 4

Conflict of Interest

(1) No person in public life shall-

- (a) allow private interest to conflict with his or her public duties or improperly influence his conduct in the performance of his or her public duties;
- (b) allow the pursuit of his or her private interests to interfere with the proper discharge of his public duties :

Provided that any such conflict that tends to interfere with the proper discharge of his or her public duties shall be reported to the Integrity Commission for guidance on a resolution as soon as practicable in favour of the official duties of the person in public life.

(2) For the purposes of this Code, a conflict of interest arises where a public official makes or participates in the making of a decisions in the execution of his or her office and at the same time knows or ought reasonably to have known that in the making of that decision, there is a material beneficial opportunity either directly or indirectly to further his or her private interests or that of a member of his or her family or any other person or entity.

(3) A person in public life shall –

- (a) In order to protect and uphold the public interest, take reasonable steps to avoid, resolve and disclose any material conflict of interest, financial or non-financial, that arises or is likely to arise, between his or her personal interests and his or her official duties;
- (b) Declare any conflict of interest in writing to relevant authority as soon as possible after becoming aware of the conflict of interest;
- (c) Refuse or relinquish any outside employment, shareholdings or directorships which creates or is likely to create a conflict of interest.

Article 5

Use of Official Influence

No person in public life shall use his or her official influence in support of any scheme or in furtherance of any contract or proposed contract or other matter in regard to which he has an interest.

Article 6

Handling of classified or proprietary information

(1) No person in public life shall-

- (a) for his or her personal advantage, benefit or gain, make use of, or communicate to anyone except in the performance of his or her official duties, the contents of any document, or any information or mater acquired in the course of his or her official duties which are not available to the public;
- (b) disclose to any unauthorized person or entity any information that is classified as privileged, confidential or otherwise protected from unauthorised disclosure, dissemination or distribution.

(2) A person in public life shall provide and implement adequate safeguards to prevent the abuse, misuse and unauthorised release of information.

Article 7

Use of public property

(1) No person in public life shall use or allow the use of public property (including money), equipment, supplies or services for any purpose other than for officially approved purposes.

(2) A person in public life shall use and manage public resources in accordance with any rules and guidelines regarding the use of those resources.

Article 8

Sexual misconduct

No person in public life shall-

- (1) pursue a course of conduct which amounts to offensive sexual comments, gestures or physical contact or other conduct of a criminal nature under the Sexual Offenses Act.
- (2) in the course of the performance of his official duties pursue a course of conduct by which he exploits his or her position or authority for his sexual gratification;

Article 9

Entertainment

- (1) No person in public life shall accept lavish or frequent entertainment from persons or entities with who the Government has, or is likely to have official dealings.
- (2) For the purposes of this Article entertainment includes invitation to sporting events and concerts.

Article 10

Use of office in an improper manner

No person in public life shall-

- (1) Use their office in an improper manner to gain a direct or indirect personal advantage for themselves or any person or entity not enjoyed by the general public but rather shall maintain appropriate confidentiality of the information they receive in the official course of their duties and this obligation continues subsequent to their resignation, retirement or dismissal;
- (2) use information obtained in the course of their official duties to gain a direct or indirect personal advantage for themselves or any other person or entity and this include inside information of any activity in any public or private entity;
- (3) in the course of the performance of his or her official duties, aid, abet, counsel, procure or command any other person to commit a breach of any of the provision of this Code of Conduct.

Article 11**Outside Employment**

No person in public life except with the written consent of the relevant authority shall engage in outside employment.

Schedule "B"- Gift Declaration Form



GUYANA GOLD BOARD
ANTI BRIBERY AND ANTI-CORRUPTION
GIFT DECLARATION FORM

Date of Declaration:

1. DETAILS OF RECEIVER

a. Full Name:

b. Position:

c. Department:

2. DETAILS OF GIVER:

a. Name of Giver:

b. Giver's Relationship with
Guyana Gold Board:

c. Details of Relationship between
Giver and Employee:

3. NATURE OF THE GIFT:

a. Date Offered:

b. Description of Gift:

c. Estimated Market Value of Gift (GYD):

d. Circumstances surrounding the giving of the gift, including reason for giving gift (e.g., I attended to giver at the Front Desk etc.):

e. Did you notify your immediate supervisor or manager about the gift?

YES

NO

WARNING: making any deliberately false or malicious declaration is a serious disciplinary offence, which may result in disciplinary or legal action against you.

Signature of Receiver:.....

4. DECLARATION BY SUPERVISOR/MANAGER

I have reviewed the circumstances surrounding the giving of the gift and is of the opinion that it does not violate this Anti-Bribery and Anti-Corruption Policy nor any laws of Guyana.

Name of Supervisor:

Signature:

5. OFFICIAL DECISION BY MANAGEMENT:

6.

(1) Decision regarding gift:

Gift to be Returned.

Gift can be accepted by Employee.

(2) Additional Comments:

Name:

Signature.....

Position:.....

Schedule "C"-Whistle Blowing Form



GUYANA GOLD BOARD

ANTI BRIBERY AND ANTI-CORRUPTION INTERNAL WHISTLE BLOWING FORM

Date of Report:

1. Select whether you wish to report anonymously or non-anonymously:

Option 1: I wish to report anonymously.

Option 2: I wish to disclose my Identity and request confidentiality from the recipient of the report.

2. If you selected Option 2 at Question 1, please provide the following details:

d. Name of Reporting Staff:

e. Position:

f. Department:

3. Details of the Wrong-Doing

a. Date of Wrong-Doing:.....

b. Nature of the wrong doing :

Acceptance or Offering of bribes for favours related to their association with GGB.

Conflict of Interest

Misuse of GGB's Assets

Other

c. If you selected Other at b. provide details of the wrong-doing. Details should include the names of all individuals involved in the wrongdoing.

4. By reporting a wrong-doing, you declare the following:

I am disclosing the information in good faith; I believe the information to be substantially true; I am not acting maliciously or making false allegations; and I am not seeking any personal or financial gain.

.....
Signature of Whistleblower (If Applicable)

5. FOR OFFICIAL USE:

a. Report Received by:

b. Designation of Receiver:

c. Findings:

d. Decision Made:

WARNING: making any deliberately false or malicious allegations is a serious disciplinary offence, which may result in disciplinary or legal action against you.

Schedule "D"

Example of "Red Flags"

Transactions and other business arrangements generally may not proceed if there are any "red flags" that have not been resolved and/or properly evaluated by the Compliance Manager. Where you wish to proceed with a transaction or business arrangement that raises any "red flags," you must resolve the "red flags" and/or refer the transaction or business arrangement to the Compliance Manager for review and guidance, as appropriate under the GGB's policies and procedures.

- 1.** The other party has a reputation for bribery and/or corruption.
- 2.** The other party has refused to promise that it will comply with anti-bribery laws and/or anti-corruption laws.
- 3.** The other party has refused to warrant that it has not paid bribes or engaged in corruption.
- 4.** The other party seeks a commission that is excessive, is paid in cash, or is otherwise irregular.
- 5.** The other party seeks payment to an account in the name of another party or at a location unrelated to the transaction (for example, an offshore account).
- 6.** The other party is owned in part by a Public Official or his or her family member or otherwise has close ties to a Public Official.
- 7.** The other party has requested that GGB prepare false invoices or any other type of false documentation.
- 8.** The other party has been designated a Politically Exposed Person.
- 9.** The other party is related to a Public Official who is in a position to grant a business advantage or is involved in a business in which such an Official has an interest.
- 10.** The other party insists that his or her identity not be disclosed to a government agency or enterprise.
- 11.** The other party refuses to identify its beneficial owners, partners, or principals.

- 12.**The justification for hiring a new agent or other intermediary is that he/she can obtain preferential treatment from a Public Official.
- 13.**Relatives of important Public Officials are on the payroll of the other party.
- 14.**The other party has relevant expenses that cannot be explained or that lack supporting documentation.
- 15.**The other party has “off the books” receipts or expenses that are relevant to the contemplated transaction.
- 16.**The other party has poor internal controls or record-keeping practices that are relevant to the contemplated transaction.

Schedule "E"



GUYANA GOLD BOARD
Anti-Bribery and Anti-Corruption Policy Receipt and Acknowledgement

I, _____, hereby acknowledge that I have received and read a copy of the "Guyana Gold Board- Anti-Bribery and Anti-Corruption Policy" and agree to respect its terms and its intent at all times.

Signature

Date



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2023