

EPHA ANTI BRIBERY POLICY

June 2024



The European Public Health Alliance

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About the European Public Health Alliance

The European Public Health Alliance (EPHA), recognised as the leading European advocacy public health NGO, is an international not-for-profit association established in Belgium in 1993. With a mission to protect and improve public health in Europe, EPHA has grown into Europe's largest platform of civil society organisations working on health. EPHA is active in all policy areas that affect health, either directly via health policies, or across areas that have an impact on health, including the social, economic, environmental factors, but also political and commercial determinants of health. In its work in the public interest, EPHA is independent from commercial funding.

What sets EPHA apart from other EU public health NGOs is its membership and its audiences. EPHA can proudly claim to be a people's platform for public health – set up by people and for people. Among its broad and versatile membership, EPHA hosts European umbrella organisations, national and regional organisations, but also the smallest of local grass roots. Its members include organisations of (public) health professionals, researchers, educators, and patients, organisations focusing on specific diseases (like cardiovascular or cancer), or on specific health threats (like tobacco or alcohol), and, importantly, an array of organisations that represent vulnerable population groups.

Notably, EPHA's nurses, doctors, scientists are not there to talk with each other - for that, they have their own professional associations. They are in EPHA to get involved in people's voice, to talk with people and to work for people.

The quest that unites such a diverse range of organisations is the right to health and combating exclusion or discrimination of anyone in Europe.

EPHA's mission

The mission of EPHA is to bring together the public health community to provide thought leadership and facilitate change, to build public health capacity to deliver equitable solutions to European public health challenges, to improve health and reduce health inequalities.

Purpose of the Anti-bribery policy

The purpose of this policy is to outline the behaviour and principles to support the EPHA's anti-bribery commitment. This policy will enable staff and Board to recognize when bribery issues arise, avoid prohibited conduct where the issues are clear, and promptly seek guidance where they are not.

The general rule is that all EPHA staff and Board, and all those acting for or on the EPHA's behalf, are strictly prohibited from offering, paying, soliciting or accepting bribes or kick-backs, including facilitation payments. Third parties, contractors, agents, representatives and intermediaries who act on behalf of the EPHA must comply with these anti-bribery provisions.

This Anti-Bribery Policy applies to all EPHA staff, including the Director General.



Prohibition against all forms of bribery

Bribery

In general, bribery means directly or indirectly offering, giving or receiving anything of value to influence the behaviour of someone to act or not act, to do something illegal, or to secure an improper advantage, regardless of intent.

A bribe can take many forms, can be transmitted through third parties, and can be of any size.

Examples include:

- Attempts to secure improper advantage in any area, for example in securing government authorisations, speeding up permits and applications, or other favourable treatment;
- Offers of any form of undue reward, not just money, including extravagant trips or entertainment or gifts of significant value;
- All means of channelling undue payments or other benefits, or for masking their purpose, whether as bribes, subcontracts, purchase orders, consultancy agreements, or through agents or other third parties;
- Receiving something of value (either directly or indirectly) in return for giving an improper advantage to a third party; and
- Receiving from a third party, either directly or indirectly, anything of more than a minimal value in connection with a transaction entered into by the EPHA.

Safeguards

EPHA staff and Board are responsible for ensuring that EPHA's anti-bribery expectations are communicated to and followed by such persons/entities, and that appropriate contractual protections and safeguards are in place where necessary.

Compliance with the policy

It is the responsibility of the Director General to ensure compliance with this policy. However, each of EPHA staff and Board has an obligation to act with integrity and to ensure that this Policy is understood and complied with. In addition, all staff and Board members will be required to confirm that they have understood and complied with the policy annually.

Responsibility for the policy

Overall accountability for upholding the terms of the Policy lies with the Director General. The entire EPHA Team is bound by the terms of this Policy and responsible for its implementation.

This policy is permanently featured on the EPHA website, in the Induction Package, and the EPHA Processes and Templates Overview Document for easy reference, and formally endorsed



by top management, ensuring transparency and reinforcing our leadership's commitment to its implementation.

Finally, all EPHA employees are responsible for treating others with dignity and respect.

Whistleblowing

EPHA is committed to ensuring that staff members can speak up with confidence if they have any concerns or need to ask for help. For this reason, EPHA developed a Whistleblower Policy. The purpose of this policy is to encourage staff, board, consultants and other stakeholders to raise any serious concerns they may have about the way in which EPHA is run or about the conduct of those involved running it. The EPHA wishes to find out if malpractice or unlawful activity exists within the EPHA so that it can be dealt with appropriately.

For further information see EPHA's Whistleblower Policy.