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M31 RESEARCH • POLICY DOCUMENT

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

M31 Research's commitment to conducting business ethically and free from bribery and corruption

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1. Purpose

This policy sets out M31 Research's commitment to conducting all of its business honestly, ethically, and with zero tolerance for bribery and corruption. It exists to ensure that staff and associates understand their responsibilities, to prevent the giving or receiving of improper advantages, and to ensure compliance with applicable anti-corruption laws and donor requirements.



2. Scope

This policy applies to all M31 Research business dealings, in every country in which we operate and in all interactions with public officials, clients, donors, suppliers, and partners. The table below summarises who and what it covers.

Applies to	Does not apply to
All M31 Research employees, associates, consultants, enumerators and field teams, interns, volunteers, and anyone acting for or on behalf of M31 Research, in all countries of operation.	No category of M31 personnel is exempt. Third-party vendors and subcontractors are expected to uphold equivalent anti-corruption standards through their contracts.



3. Definitions

Term	Definition
Bribery	Offering, promising, giving, requesting, or accepting any financial or other advantage to induce or reward the improper performance of a function or activity.
Corruption	The abuse of entrusted power or position for private gain.
Facilitation payment	A small unofficial payment made to secure or speed up a routine action by an official (a "grease payment"). Such payments are prohibited under this policy.
Kickback	The return of a sum already paid or due, as a reward for awarding or fostering business.
Public official	Any person holding a legislative, administrative, or judicial position, or providing a public service, including employees of state-owned entities and international organisations.
Conflict of interest	A situation in which personal interests could improperly influence professional judgment or duties.
Gifts and hospitality	Anything of value offered or received; permissible only within defined limits and never to improperly influence a decision.



4. Policy Statement

M31 Research is committed to the following principles:

- **Conduct all business honestly and transparently, with zero tolerance for bribery and corruption.**
- **Prohibit the offering, giving, soliciting, or accepting of bribes, kickbacks, or any other improper advantage, whether directly or through a third party.**
- **Prohibit facilitation payments, except where there is an imminent threat to personal safety, in which case the payment must be reported immediately.**
- **Comply with all applicable anti-corruption laws in our countries of operation and with the requirements of our clients and donors.**
- **Permit only modest, proportionate, and transparent gifts and hospitality, recorded in a register and never intended to influence a decision.**
- **Identify, declare, and manage actual, potential, and perceived conflicts of interest.**
- **Exercise proportionate due diligence on agents, partners, suppliers, and subcontractors, and include anti-corruption clauses in contracts.**
- **Maintain accurate and complete books and records, and prohibit off-book accounts or false documentation.**
- **Provide safe, confidential whistleblowing channels and protect those who report concerns in good faith from retaliation.**



5. Roles & Responsibilities

Role	Responsibility
Leadership / Board	Accountable for this policy. Sets the ethical tone from the top, ensures resources, and reviews anti-corruption performance.
Policy Owner	The Managing Director owns and maintains this policy, oversees due diligence and the gifts register, and reports to the Board.
Managers	Implement the policy, ensure team awareness, review gifts and hospitality, and escalate concerns.
All Staff	Comply with this policy, refuse and report bribery, declare conflicts and gifts, and complete required training.
Finance	Maintains accurate financial records and internal controls, and administers the gifts, hospitality, and conflicts-of-interest registers.



6. Procedures

1. **Refuse any bribe, kickback, or facilitation payment, and report it promptly to your manager or the policy owner.**

2. Record all gifts and hospitality given or received above the defined threshold in the gifts and hospitality register, and obtain approval where required.
3. Declare any actual, potential, or perceived conflict of interest as soon as it arises.
4. Conduct proportionate anti-corruption due diligence on agents, partners, suppliers, and subcontractors before engagement.
5. Include anti-bribery and anti-corruption clauses and audit rights in contracts with third parties.
6. Maintain accurate and complete financial books, records, and supporting documentation.
7. Report suspected bribery or corruption through the whistleblowing channel; reports may be made confidentially.
8. Investigate reports promptly and fairly, applying disciplinary action and notifying authorities or donors where required.
9. Provide anti-bribery and anti-corruption training to all staff and track completion.

7. Compliance & Monitoring

Compliance with this policy is mandatory. M31 Research will monitor adherence through:

- maintenance and review of the gifts, hospitality, and conflicts-of-interest registers;
- anti-corruption due diligence checks and contract reviews;
- internal financial controls and audits;
- tracking of whistleblowing reports and corrective actions.
- Breaches may result in disciplinary action up to and including termination of employment or contract, and referral to law enforcement. Individuals may also face personal criminal liability under applicable law.

8. Related Documents

- M31 Research Code of Conduct and Ethics Policy
- M31 Research Whistleblowing Policy
- M31 Research Conflict of Interest Policy
- M31 Research Procurement Policy
- M31 Research Finance Policy
- Zambia Anti-Corruption Act No. 3 of 2012, and equivalent anti-corruption legislation in other countries of operation
- UK Bribery Act 2010 and US Foreign Corrupt Practices Act (FCPA), where applicable
- United Nations Convention against Corruption (UNCAC)



9. Review

This policy will be reviewed every 12 months, or sooner if circumstances change, such as new legislation, revised client or donor requirements, or significant changes to M31 Research's operations.



10. Contact

Questions about this policy?

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