GLOBAL FOOD ROUND

Anti-Bribery, Fraud, Sanctions & Conflicts Policy

Baseline integrity controls for cross-border procurement and humanitarian-facing operations.

Status notice. Global Food Round is currently an informational prototype and verification-stage project. Public payments and donations are not accepted through the prototype. This document sets intended controls and launch conditions; it does not state that any supplier, distribution organization, fiscal sponsor, charitable status, tax treatment, license, or public-fundraising permission has been approved unless expressly identified as such.

1. Improper-benefit prohibition

- No bribe, kickback, secret commission, falsified invoice, false delivery record, diversion, or undisclosed personal benefit may be offered, requested, authorized, accepted or concealed in project activity.
- Local custom or urgency does not by itself justify an unlawful payment.

2. Conflicts of interest

- Volunteers, reviewers and decision-makers should disclose personal, family, professional or financial relationships with candidate suppliers, distribution organizations or payment intermediaries.
- A disclosed relationship does not automatically disqualify a candidate, but the conflicted person should not independently verify or approve it.

3. Sanctions and trade-control gate

- Before any relevant transaction, the responsible legal/fund-holding entity must determine which sanctions and trade-control regimes apply based on parties, ownership/control, currency, banks, payment rails, destination and other jurisdictional connections.
- Risk-based screening should cover suppliers, distribution organizations, material counterparties and payment beneficiaries. A country appearing on the map is not authorization to transact.
- Humanitarian exemptions and general licenses may exist, but their scope, conditions, recordkeeping and exclusions must be checked for the exact transaction. If authority is uncertain, the transaction remains on hold pending qualified review or required authorization.

4. Payment-instruction fraud

- Obtain payment details through verified channels and independently verify material changes.
- Do not redirect refunds to an unverified third party merely at the request of a consignee, volunteer or contact person.

5. Escalation and stop rule

Credible indications of fraud, bribery, sanctions exposure, diversion, identity mismatch, coerced beneficiary evidence, or manipulated documentation trigger a hold on the affected approval, publication or transaction until reviewed.

6. Records

Preserve enough records to explain the compliance decision, including source checks, screening results where lawful, approvals, quotations, invoices, payment records, delivery evidence, recipient acknowledgment, exceptions and escalation decisions, subject to privacy and retention rules.

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This policy is a project compliance document, not a substitute for jurisdiction-specific legal advice on an actual transaction.