



Global Empowerment Mission  
1850 NW 84TH Ave, Ste 100, Doral, FL 33126  
[www.globalempowermentmission.org](http://www.globalempowermentmission.org)

## **GEM Anti-Bribery and Corruption Policy**

### **INTRODUCTION**

Global Empowerment Mission (GEM) is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act (UKBA) and similar laws in other countries that prohibit improper payments to obtain a business advantage. This document describes GEM's Policy prohibiting bribery and other improper payments in the conduct of GEM's operations and employee responsibilities for ensuring implementation of the Policy. Questions about the Policy or its applicability to particular circumstances should be directed to Michael Capponi, President.

### **POLICY OVERVIEW**

GEM strictly prohibits bribery or other improper payments in any of its business operations. This prohibition applies to all business activities, anywhere in the world, whether involving government officials, nonprofit organizations, or other commercial enterprises. A bribe or other improper payment to secure a business advantage is never acceptable and can expose individuals and GEM to possible criminal prosecution, reputational harm or other serious consequences. This Policy applies to everyone at GEM, including all officers, employees and agents or other intermediaries acting on GEM's behalf. Each officer and employee of GEM has a personal responsibility and obligation to conduct business activities ethically and in compliance with all applicable laws based on the countries wherein GEM does business. Failure to do so may result in disciplinary action, up to and including dismissal.

Improper payments prohibited by this policy include bribes, kickbacks, excessive gifts or entertainment, or any other payment made or offered to obtain an undue business advantage. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related



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to the conduct of GEMs business. The President has overall responsibility for the program, supported by the executive leadership of GEM. The President is responsible for giving advice on the interpretation and application of this policy, supporting training and education, and responding to reported concerns. The prohibition on bribery and other improper payments applies to all business activities, but is particularly important when dealing with government officials. The U.S. Foreign Corrupt Practices Act and similar laws in other countries strictly prohibit improper payments to gain a business advantage and impose severe penalties for violations.