

CTIP Anti-Bribery and Corruption Policy

I. Purpose

CTIP (Conshohocken Theater in the Parks) is committed to conducting all activities with integrity, transparency, and accountability. This policy outlines CTIP's stance against bribery and corruption and establishes procedures to prevent unethical behavior in all organizational dealings.

II. Scope

This policy applies to:

- All CTIP board members, staff, volunteers, contractors, and representatives
 - All CTIP-related activities, including fundraising, procurement, partnerships, and programming
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III. Policy Statement

CTIP strictly prohibits:

- Offering, giving, soliciting, or receiving any bribe or improper payment
- Using personal influence or gifts to gain preferential treatment
- Accepting kickbacks, favors, or anything of value in exchange for CTIP resources, decisions, or access

Bribery includes:

- Cash payments
 - Gifts or hospitality intended to influence decisions
 - Promises of employment or contracts
 - Donations made with the expectation of a specific outcome
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IV. Gifts and Hospitality

CTIP personnel may not accept or offer gifts or hospitality that:

- Exceed **\$50 in value**

- Are intended to influence a decision or action
- Create a conflict of interest or appearance of impropriety

Any gift or hospitality must be:

- **Disclosed** to the CTIP Board
 - **Approved** if it exceeds the threshold or involves a vendor, donor, or partner
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V. Procurement and Financial Integrity

All purchases and financial decisions must be:

- Based on merit, cost-effectiveness, and alignment with CTIP's mission
- Free from favoritism, personal gain, or external pressure
- Supported by documentation and receipts

CTIP will not:

- Reimburse purchases made under coercion or with the intent to gain favor
 - Approve contracts or partnerships based on personal relationships or incentives
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VI. Reporting and Whistleblower Protection

Any suspected bribery or unethical conduct must be reported to:

- CTIP's Designated Ethics Officer or Board Chair
- Reports may be made anonymously and without retaliation

CTIP will:

- Investigate all reports promptly and confidentially
 - Take disciplinary action, including termination or legal referral, if misconduct is confirmed
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VII. Training and Compliance

All CTIP personnel will receive training on:

- Anti-bribery principles
- Conflict of interest disclosure
- Ethical decision-making

Annual compliance reviews will be conducted to ensure adherence to this policy.

VIII. Enforcement

Violations of this policy may result in:

- Immediate suspension or termination
 - Legal action or referral to authorities
 - Disqualification from future CTIP involvement
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IX. Review and Updates

This policy will be reviewed annually by the CTIP Board and updated to reflect changes in law, best practices, and organizational needs.