

Anti Corruption and Bribery Policy

Introduction and Purpose

Bribery and corruption hurt the poor disproportionately, diverting resources intended for development and humanitarian assistance to the already privileged sections of society and increasing the costs of basic public services. They undermine the economic growth of a nation and are a barrier to poverty alleviation and good governance. Often, bribery and corruption can aggravate conflict and insecurity. There is a risk that corruption will prevent Non-Government and Non-Profit Organizations (NGO and NPO) from achieving their objectives, especially when they are working in countries where there are high levels of corruption.

Suggestions that an NGO or NPO is linked to bribery in any way can be damaging to its reputation and undermine the trust and support of beneficiaries, partners, the wider public and donors. Public concern about the impact of bribery and corruption is a critical issue in building broad public support for aid and development. Non-Profit organizations, thus, need to act, and be seen to act in a way that is honest and transparent. Many organizations are also actively working to reduce bribery, so it is important that they lead by example.

Preamble

Rubaroo (Society and Consultancy) is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is Rubaroo's policy to conduct all of its projects and programmes with honesty, integrity and the highest possible ethical standards. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships .

Any Rubaroo employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy (or we have reasonable suspicion to believe this is the case) may have their contract terminated with immediate effect. This policy does not form part of any employee's contract of employment and shall be amended from time to time.

Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Committee will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to committee potential violations of this Policy, or who

misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Definition

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Bribery includes offering, promising, giving, accepting or seeking a bribe.

All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery raise it with (prevention of corruption)committee.

POLICY recommends specifically that you must not:

1. give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
2. accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
3. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
4. threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining Rubaroo's image or reputation.

- A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
- Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in the name of Rubaroo – not your own name.
- Promotional gifts of low value such as Global Goals merchandise may be given to our existing suppliers and business partners and we can accept equivalent gifts from them.

- You must declare and keep a written record of all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
- All accounts, invoices, and other records relating to dealings with third parties including suppliers should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to facilitate or conceal improper payments.
- All employers/staff/intern/volunteers are strictly prohibited from offering, paying, promising, or authorizing: any payment or other thing of value; to any person; directly or indirectly through or to a third party; for the purpose of (i.e., in exchange for); causing the person to act or fail to act in violation of a legal duty; causing the person to abuse or misuse their position; or securing an improper advantage, contract or concession; for Rubaroo or any other party.

If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the executive team of Rubaroo immediately and appropriate action shall be taken with immediate effect.