



## Anti-Fraud and Corruption Policy

**Policy Area:** Fraud and Corruption

**Policy Ref:** CFI-AFCP

**Title of Policy:** Anti-Fraud and Corruption Policy

**Approved Date:** January 2021

**Effective Date:** immediately

**Review Date:** January 2022

**Approved By:** Lee Henley

**Policy Rationale:** At Children's Future International we take a zero-tolerance approach to fraud, bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships and in the promotion of our vision, mission and values. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for serious misconduct. Any contractor 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 we may amend it at any time.

**Policy Statement:** At Children's Future International we conduct all our work in an honest and ethical manner.

### Contents

Article I: DEFINITIONS	1
Article II: PROCEDURES	2
Article III: YOUR RESPONSIBILITIES	3
Article IV: PROTECTION	4

### Article I: DEFINITIONS

#### 1.1 Agent: who must comply with this policy

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.

## **1.2 Bribery or corruption**

Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.

## **1.3 Facilitation Payments**

A form of Bribery in which small payments are made with the purpose of expediting or facilitating the performance by a Public Official of a routine governmental action and not to obtain or retain business or any other undue advantage. Facilitation payments are typically demanded by low level and low income Public Officials in exchange for providing services to which one is legally entitled without such payments.

## **1.4 Fraud**

This relates to wrongful or criminal deception intended to result in financial or personal gain.

## **1.5 Gifts, Invitations & Hospitality**

Invitations given or received to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.

# **Article II: PROCEDURES**

## **2.1 Record keeping**

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.

## **2.2 How to raise a concern**

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 your manager, the Executive Director, Technical Director, or Managing Director as soon as possible.

## **2.3 Whistleblowing**

If you suspect another person at Children's Future International may be acting against this policy you may report this to your manager, the Executive Director, Technical Director, or Managing Director. Following this an investigation will take place, but you are not entitled to know the outcome in order to respect the individual's privacy. However, your involvement will remain confidential to the executive team.

## **Article III: YOUR RESPONSIBILITIES**

### **3.1 It is not acceptable for you (or someone on your behalf) to:**

- a. receive, or to reward a business advantage already given;
- b. give, promise to give, or offer, a payment, gift or hospitality to a Public Official or Third Party to 'facilitate' or expedite a routine procedure;
- c. accept payment from a Third Party that you know, or suspect, is offered with the expectation that it will obtain a business advantage for them;
- d. accept a gift or hospitality from a Third Party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- e. threaten or retaliate against another Employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- f. engage in any activity that might lead to a breach of this policy or perceived breach of this policy.

**3.2** It is your responsibility to ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book'.

- a. give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage

**3.3** You must declare and keep a written record of all Gifts, Invitations & Hospitality according to Company practice accepted or offered, which will be subject to managerial review.

**3.4** You must ensure all expense claims relating to Gifts, Invitations & Hospitality or expenses incurred to Third Parties are submitted in accordance with the Company's expenses policy and specifically record the reason for the expenditure.

**3.5** The prevention, detection and reporting of any form of Bribery & Corruption are the responsibility of all Employees. You must notify your manager, the Executive Director, Technical Director, or Managing Director as soon as possible if you are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

**3.6** All Employees have a responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

**3.7** Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for serious misconduct.

**3.8** This policy should be read in conjunction with the Employee Handbook, Conflicts of

Interest policy and Code of Ethics.

#### **Article IV: PROTECTION**

**4.1** Employees who refuse to take part in bribery or corruption, or report in good faith under this policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment/retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.