



# Anti-Corruption Policy

**Preamble:** The diversion of resources or miss-use of power compromises our values and our accountability in our work with youths and communities.

Suggestions that Giving Hope Foundation is linked to corruption can be damaging to our reputation, thus undermining the morale of staff, and the trust and support of beneficiaries, partners, the wider public and donors.

Corruption also poses legal risks both for the organisation and individuals involved. We must act, and be seen to act, in a way that is honest and transparent.

This policy supports existing policies and standards (such as the Code of Conduct), thus reinforcing Giving Hope Foundation's commitment to foster an organizational culture in which corruption is never acceptable. It further clarifies standards of conduct for the prevention of corruption and provides a common foundation for the development of procedures to manage Giving Hope Foundation's corruption risk across our operations.

## **Policy Statement:**

1. Corruption on the part of any Giving Hope Foundation employee, board member or volunteer or any third party (consultant, vendor, partners, etc.) in their engagement with Giving Hope Foundation entities, is prohibited.
2. No Giving Hope Foundation Person, or any third party acting on behalf of Giving Hope Foundation or dealing with Giving Hope Foundation, shall offer to pay a bribe, or pay a bribe, nor shall they solicit the payment of a bribe, or accept a bribe in conjunction with any aspect of Giving Hope Foundation's activities.
3. Payments otherwise prohibited should be considered only if there is immediate threat to personal safety in which case the payment must be immediately reported to management and clearly identified in the accounting records as such.
4. All Giving Hope Foundation entities will foster an organizational culture in which

corruption is never acceptable.

5. All Giving Hope Foundation entities will ensure employees, board members, volunteers, and third parties that engage with Giving Hope Foundation are made aware of the Anti-corruption Policy.
6. All Giving Hope Foundation entities will implement a “whistleblower” policy and procedures to provide employees, board members, volunteers, and third parties with a mechanism to report evidence of misconduct, including corruption, and to encourage such reporting.
7. Employees of Giving Hope Foundation who commit a corrupt act, fail to knowledge or report an act of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Board Members who fail to comply with this policy are subject to removal. Third parties who fail to comply with this policy will have their agreements and/or contracts with Giving Hope Foundation terminated. Giving Hope Foundation may also seek restitution or prosecution or other legal remedies.
8. Giving Hope Foundation entities will immediately report instances of suspected and actual corruption to the Board of Directors, where one exists (except in cases where the allegation is directed at that body), which is responsible and accountable for ensuring the incident is investigated appropriately. Also, all incidents of suspected and actual corruption will immediately be reported to the Board of Directors, who will also notify relevant parties (e.g., funding entities).

### **Definitions:**

Corruption is defined as **“the abuse of entrusted power for gain”**. It includes practices such as bribery, fraud, extortion, collusion and money laundering. It also includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the organization’s activities. This may include cash or in-kind benefits, such as free goods, gifts, and holidays, or special personal services provided for the purpose of an improper advantage or that may result in moral pressure to receive such an advantage.

Occasional minor gifts and entertainment should be handled in accordance with the applicable Conflicts of Interest Policy or other related policies.