

**ANTI BRIBERY AND CORRUPTION POLICY FOR ABUNDANCE**

1) Policy Statement

1.1 Abundance is devoted to applying the highest standards of ethical conduct and integrity in its non-profit activities in Malawi and anywhere it may operate. As a voluntary run organization, all volunteers and individuals acting on behalf of Abundance is responsible for upholding and maintaining its reputation and conducting its projects and activities honestly and professionally.

1.2 Abundance takes a zero-tolerance approach to bribery and corruption. Abundance will avoid at all costs to avoid acts which might reflect adversely upon the integrity and reputation of our non-profit organization. Abundance is committed to acting professionally, fairly and with integrity in all our business dealings, project implementation and relationships wherever we operate.

1.3 The purpose of this policy statement is to:

a) set out our responsibilities for members of Abundance, and of those working or providing services for Abundance, in observing and upholding our position on bribery and corruption;

b) provide information and guidance as to how we expect those working for us to conduct themselves and how to recognise and deal with bribery and corruption issues; and

c) explain the procedure for raising concerns with Abundance including any breaches of this policy statement

1.3 Abundance’s Board and members are committed to implementing and enforcing effective systems throughout Abundance’s activities.

2) What is bribery and corruption?

Any reward offered, inducement, promised, given or authorised directly or indirectly, to improperly influence anyone, or to reward anyone for the improper performance of any function or activity, in order to secure or gain any benefit, whether commercial, contractual, regulatory or personal advantage. A bribe can be a direct or indirect promise or offer of something of value, the offer or receipt of a kickback, fee, reward or other advantage, the giving of aid, donations or voting designed to exert improper influence. Corruption is the misuse of public office or power for private gain or the misuse of private power in relation to business outside the realm of government.

3) Responsibilities

Anyone working for, volunteering for or in any way is attached to Abundance has the responsibility for the prevention, detection and reporting of bribery and other forms of corruption.

4) Gifts and Hospitality

4.1 Abundance permits normal and appropriate community and corporate entertainment, gifts, hospitality and promotional expenditure (given and received) to or from third parties that is undertaken:

a) that is culturally appropriate for the purpose of establishing and maintaining good working relationships

b) to improve the image and reputation of Abundance

Provided that it is:

a) in good faith

b) not offered, promised or accepted to secure an advantage for the its vlunteers/employees or associated persons or to influence the impartiality of the recipient

4.2 Any gifts received or given which is over the value of MK50,000 should be approved by Abundance’s Board. The giving or receiving of promotional material such as diaries, calenders, stationary is not considered a gift.

4.3 The giving and receiving of corporate entertainment and hospitality for our employees should not exceed an approximate value of MK50,000 per head and needs approval of the Board of Directors.

4.4 What is key is to check whether in all the circumstances, the gift, entertainment or hospitality is reasonable and justifiable. We expect the intention behind the gift to always be considered.

5) What is not acceptable?

Any activity which is illegal in the country should not be conducted by staff/volunteers of Abundance. They must not:

a) give, promise to give, or offer, a payment, gift or hospitality to a third party with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

c) give, offer or promise to a foreign public official to induce that public official to obtain or retain business or an advantage in the conduct of business (and that is not permitted by local laws), request, agrees to receive or accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them;

d) request, agrees to receive or accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them) accept a gift or hospitality from a third party knowing or suspecting that it is offered or provided with an expectation that a business advantage will be provided by Abundance

e) accept a gift or hospitality from a third party knowing or suspecting that it is offered or provided with an expectation that a business advantage will be provided by Abundance in return;

f) threaten or retaliate against another member who has refused to commit a bribery offence or who has raised concerns under this policy; and

g) engage in any activity that might lead to a breach of this policy.

6) Facilitation payments and kickbacks

6.1 Abundance and our service providers should not make, and should not accept, facilitation payments or "kickbacks" of any kind.

6.2 If you are asked to make a payment on behalf of the Abundance, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Receipts should always be asked.

6.3 Any transactions in contracts and documentation must be recorded so that there is never any attempt to hide the way a contract will work.

7) Record Keeping

7.1 Abundance and our service providers are expected to keep financial records and have appropriate internal controls in place which will evidence the business reason for giving and/or receiving payments from/to third parties.

8) Raising Concerns

8.1 If you believe this policy has been breached, or suspect it may have been breached, in any way please email [abundance.future@gmail.com](mailto:abundance.future@gmail.com)

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