

SUSTAINABLE HUB FOR POLICY INITIATIVES



ANTI CORRUPTION POLICY

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Anti-Corruption Policy

Introduction

The purpose of this Anti-Corruption Policy is to make SHPI to prevent and detect corruption. SHPI has a zero tolerance approach towards all forms of bribery and corruption.

The Policy shall be applied to all affairs and functions of the SHPI. The Policy supplements SHPI's governance manual, the code of conduct and policies, rules and task-specific instructions regarding gifts, hospitality and entertainment.

The Policy shall be complied with, where applicable, however taking into account the local legislation and the separate instructions relating to bribery and corruption.

Objectives of Anti-Corruption Policy

1. To emphasize that the organization has zero-tolerance for corruption
2. To explain whom the policy applies
3. To explain the employees' responsibilities on corruption
4. To reduce and control corruption risks.
5. To provide rules about accepting gifts.
6. To provide guidance on how business should be conducted so to prevent corruption
7. To provide direction on how to avoid conflicts of interest.
8. To provide information about monitoring and reviewing the policy.

Basic principles

The policy applies to SHPI directors, officers and employees. The Policy also applies to consultants, suppliers, distributors, partners, agents and/or any other third parties acting on behalf of SHPI.

SHPI requires employees and associates to act honestly and with integrity at all times. Furthermore, SHPI requires employees to safeguard all the SHPI's material, immaterial and human resources for which they are responsible.

SHPI will not tolerate any level of corruption. All allegations of bribery and corruption (anonymous or otherwise) will be investigated thoroughly without regard to the suspected person's position, length of service or relationship to SHPI.

Any breaches of the code or other corporate guidelines or policies will be investigated, and, based on the findings; appropriate corrective measures will be taken.

The policy is informed to all associates with a notion that SHPI expects all activities carried out on their behalf in compliance with the policy.

General Prohibitions

Corruption is a specific form of fraud which is defined as the abuse of entrusted power for private gain. It is also defined as the unlawful use of a position in order to get an advantage in contravention of duty.

In particular, Employees and associates are prohibited from directly or indirectly giving, promising, authorizing or offering money or anything else of value to anyone in connection with business dealings in order to obtain an improper advantage.

Employees are prohibited from directly or indirectly asking, demanding, accepting, and receiving anything of value from any associates in connection with business dealings in order to obtain an improper advantage. Facilitation payments are form of corruption and are strictly prohibited.

Board of Directors

The Board of Directors conducts oversight of the Policy.

Executive Director

The policy is approved by the board of directors based on executive director proposal. The executive director is responsible that the policy is introduced and communicated to all employees. The boards of directors are also responsible for the interpretation of the policy and that the policy is evaluated on a regular basis. They are also responsible for that relevant anti-corruption training for employees is provided.

Management

The primary responsibility for the implementation of the policy in daily business is with respective management in operating workplace. Members of the respective management teams need to be familiar with types of bribery and corruption that

might occur within his/her area of responsibility and be alert for any indication of irregularity.

The respective management is responsible for ensuring that an adequate system of internal controls exists within areas of responsibility and that such controls operate effectively.

Employees

All employees are required to:

1. Conduct themselves in accordance with policy, SHPI's code of conduct, governance manual, and other policies;
2. Act with propriety and integrity, especially in dealing with third parties
3. An employee who discovers or suspects violations must inform SHPI executive director for audit immediately for further actions.

Corruption Definition

SHPI defines corruption as *the misuse of entrusted power for private gain.*

This definition is not limited to interactions with public officials and covers both attempted and actual corruption, as well as monetary and non-monetary corruption. Examples of the forms corruption takes include, but are not limited to: facilitation payments, bribery, gifts constituting an undue influence, kickbacks, favoritism, cronyism, nepotism, extortion, embezzlement, misuse of confidential information, theft, and various forms of fraud, such as forgery or falsification of documents, and financial or procurement fraud.

Corruption Risk

Corruption is extensive, institutionalized and even systemic in many of the environments in which SHPI operates around the context. It poses a risk both internally in the organization and externally in interactions with people of concern, beneficiaries, public officials, contractors and others. SHPI operates in urban locations where the responsible governments often have little capacity to tackle corruption. SHPI thus strives to prevent any possibility that the assistance it provides might generate new corruption opportunities or reinforce existing ones. Not only this, but through its Anti-Corruption Policy and strict zero tolerance approach to

corruption, SHPI also aims to eliminate corruption from its work and to reduce overall levels of corruption in its areas of operation.

Investigation of Suspected Violations

The executive director will handle and make decisions on all suspected acts that are reported or observed otherwise. An investigation plan will be made in each case and if necessary, the external specialists will be used in fraud investigation. The executive director will make the decision whether to refer the case to an external specialist agency for independent investigation. After the independent investigation, the executive director and board of directors will make the decision on the necessary actions.

Engagement of Third Parties

The services of Third Parties are needed to assist SHPI in its business activities. SHPI may be liable if a Third Party acts improperly and bribes others on behalf of SHPI. Therefore it is essential to perform adequate due diligence of Third Parties.

Due Diligence

The appropriate level of due diligence to prevent bribery will vary depending on the risks arising from the particular relationship and the type of services to be provided by the Third Party.

Documentation

All contracts with Third Parties must be in writing, and filed and recorded along with the results of the due diligence process.

Fees

Payments made to Third Parties should represent no more than an appropriate remuneration for legitimate services rendered by such Third Parties. No payments shall be made without a detailed invoice which accurately describes the services provided and expenses incurred. No part of the payment should be passed on by the Third Party as a bribe or otherwise in contradiction of the Policy.

Confidentiality

All information received related to the investigation will be treated with confidence. The results of investigation will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct and to protect SHPI from potential civil liability.

Any employee who suspects a violation of the policy is not allowed to attempt to personally conduct investigations or interviews related to any suspected act.

The policy will be reviewed every five years to ensure that it is relevant to and reflects SHPI's efforts and actions.

Policy approval

This policy was formulated by the board of directors to be adopted by all employees in sustainable hub for policy initiatives landscape.

It was approved by the board of directors to be exercised on 1st Julay,2017.

Name	position	signature
1. SINDA MANJI	BOARD MEMBER
2. TIBEZUKA FUNDISHA	BOARD MEMBER
3. NEEMA TENGERSAS	BOARD MEMBER
4. TANGANYIKA MHOJA	BOARD MEMBER