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SOSHEDO FOUNDATION ANTI-FRAUD AND ANTI-CORRUPTION POLICY

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1. POLICY STATEMENT

SOSHEDO Foundation is committed to the highest standards of integrity, accountability, transparency, and ethical conduct in all its operations. SOSHEDO Foundation adopts a zero-tolerance approach to fraud, bribery, corruption, embezzlement, theft, kickbacks, facilitation payments, collusion, and any form of financial or non-financial misconduct. This policy applies to all Board members, staff, volunteers, consultants, contractors, suppliers, partners, and beneficiaries. This approach aligns with internationally recognized anti-corruption and accountability principles used by leading NGOs and international organizations.

2. PURPOSE

The purpose of this policy is to:

- Prevent fraud and corruption.
- Promote ethical conduct and accountability.
- Protect organizational resources.
- Ensure compliance with national and international laws.
- Strengthen donor confidence and public trust.
- Establish mechanisms for reporting, investigation, and sanctions.

3. SCOPE

This policy applies to:

- Board Members
- Management

- Employees
- Volunteers
- Interns
- Consultants
- Contractors
- Suppliers
- Partner Organizations
- Beneficiaries involved in SOSHEDO Foundation programmes

4. GUIDING PRINCIPLES

SOSHEDO Foundation shall be guided by:

- Integrity
- Accountability
- Transparency
- Professionalism
- Fairness
- Value for Money
- Non-discrimination
- Stewardship of Resources

These principles reflect international good-governance and anti-corruption frameworks widely adopted by civil society organizations.

5. DEFINITIONS

Fraud

Any intentional act of deception designed to obtain an unauthorized benefit or cause loss to SOSHEDO Foundation or another party.

Examples:

- Falsification of documents.
- Misappropriation of funds.
- Payroll fraud.
- Procurement fraud.
- Forged receipts.
- False claims.

Corruption

Abuse of entrusted power for private gain.

Examples:

- Bribery
- Kickbacks
- Nepotism
- Conflict of interest
- Favouritism
- Extortion
- Bribery

Offering, giving, receiving, or soliciting anything of value to improperly influence a decision.

Conflict of Interest

A situation where personal interests interfere or appear to interfere with official duties.

6. PROHIBITED CONDUCT

The following are strictly prohibited:

- ✓ Financial Misconduct
- ✓ Embezzlement
- ✓ Theft of assets
- ✓ Unauthorized expenditure
- ✓ Diversion of donor funds
- ✓ Procurement Fraud
- ✓ Bid rigging
- ✓ Collusion with suppliers
- ✓ Manipulation of procurement processes
- ✓ Splitting procurements to avoid approvals
- ✓ Bribery and Kickbacks
- ✓ Receiving commissions from suppliers
- ✓ Paying bribes to obtain contracts
- ✓ Facilitation payments
- ✓ Abuse of Position

- ✓ Favouring relatives or friends
- ✓ Nepotism
- ✓ Political patronage
- ✓ Falsification
- ✓ Altering records
- ✓ Forging signatures
- ✓ False reporting

7. CONFLICT OF INTEREST

All staff and Board members shall:

- Declare actual, perceived, or potential conflicts of interest.
- Refrain from participating in decisions where conflicts exist.
- Complete annual conflict-of-interest declarations.
- Failure to disclose a conflict may result in disciplinary action. Conflict-of-interest controls are considered a core component of NGO anti-corruption systems.

8. GIFTS, HOSPITALITY AND BENEFITS

Employees and Board members shall not:

- Accept gifts that influence decision-making.
- Solicit gifts or favours.
- Receive personal benefits from suppliers or partners.
- Nominal gifts of symbolic value may be accepted if approved and recorded.

9. WHISTLEBLOWER PROTECTION

- SOSHEDO Foundation encourages reporting of suspected fraud or corruption.
- Reports may be made through:
 - Executive Director
 - Board Chairperson
 - Internal Auditor
 - Ethics Committee
 - Dedicated reporting email
 - Anonymous reporting channels
- No whistle-blower shall suffer retaliation, intimidation, discrimination, dismissal, or harassment for reporting in good faith. Strong complaint and whistle-blower mechanisms are widely recognized as key anti-corruption safeguards.

10. REPORTING PROCEDURES

- Any person who suspects fraud or corruption shall immediately report:
- Nature of allegation
- Individuals involved
- Evidence available
- Date and location of incident
- Reports may be confidential or anonymous.
- False and malicious allegations may attract disciplinary measures.

11. INVESTIGATION PROCEDURES

Upon receipt of a complaint:

- Preliminary assessment shall be conducted.
- Investigation team appointed.
- Evidence gathered and documented.
- Concerned parties interviewed.
- Investigation report prepared.
- Recommendations submitted to the Board.
- Investigations shall be fair, impartial, confidential, and timely.

12. SANCTIONS

Individuals found guilty may face:

- ✓ Administrative Action
- ✓ Warning
- ✓ Suspension
- ✓ Demotion
- ✓ Termination
- ✓ Financial Action
- ✓ Recovery of funds
- ✓ Asset restitution
- ✓ Legal Action
- ✓ Referral to law enforcement agencies
- ✓ Civil proceedings
- ✓ Criminal prosecution

13. INTERNAL CONTROLS

SOSHEDO FOUNDATION shall maintain:

- Segregation of duties
- Dual authorization of payments
- Regular reconciliations
- Asset registers
- Competitive procurement procedures
- Annual external audits
- Internal audits
- Risk assessments
- Comprehensive controls and risk-management systems are considered essential elements of effective anti-corruption programs.

14. TRAINING AND AWARENESS

SOSHEDO Foundation shall:

- i. Conduct annual anti-corruption training.
- ii. Orient new staff on ethical conduct.
- iii. Regularly communicate policy requirements.
- iv. Promote a culture of integrity.

15. RESPONSIBILITIES

Board of Directors

- Provide oversight.
- Approve policy reviews.
- Ensure enforcement.

Chief Executive Officer

- ✚ Lead implementation.
- ✚ Ensure adequate resources.
- ✚ Managers
- ✚ Monitor compliance.
- ✚ Report suspected misconduct.

Staff and Volunteers

- Comply with policy.
- Report wrongdoing.

Strong leadership oversight and a clear “tone from the top” are recognized as international best practice in anti-bribery and anti-corruption governance.

antibriberyguidance.org

16. MONITORING AND REVIEW

The policy shall be:

- Reviewed every two years.
- Reviewed after major incidents.
- Updated to reflect legal and donor requirements.

17. POLICY COMPLIANCE DECLARATION

All Board members, employees, volunteers, consultants, and partners shall sign an annual declaration confirming that they:

- Have read this policy.
- Understand its provisions.
- Agree to comply with its requirements.
- Will report any suspected fraud or corruption.

APPROVAL:

Approved by: SOSHEDO Foundation Board of Directors & Executive Committee Members

Chairperson: Okori Lawrence



Executive Director/CEO: Sharon Apio



Official stamp/Date

