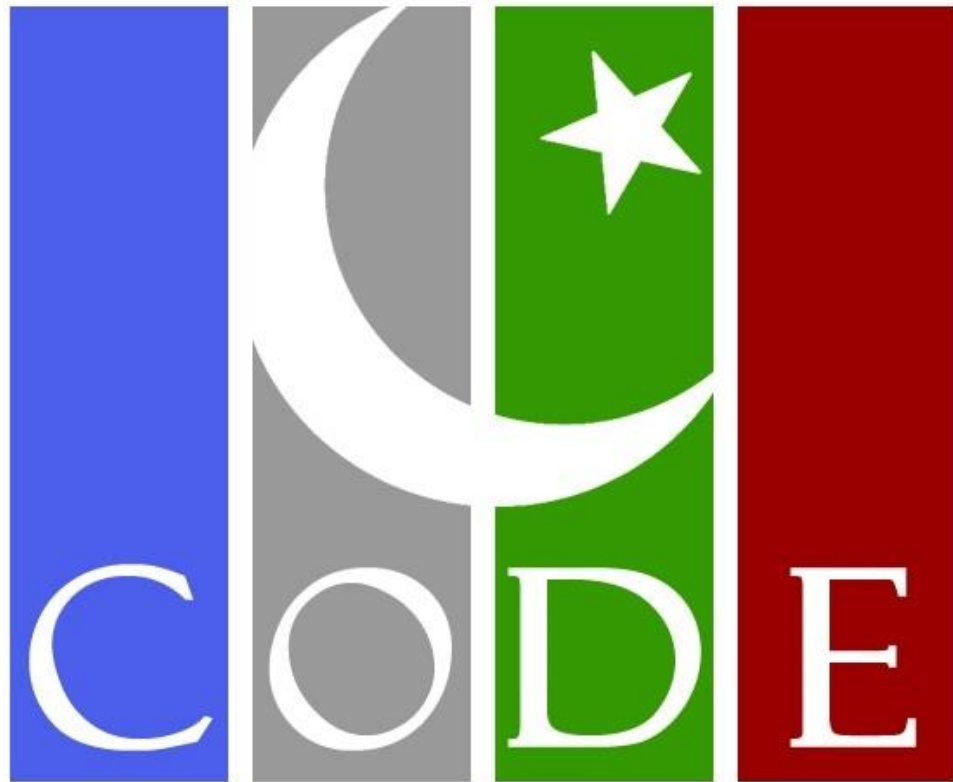


ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY



CURSOR OF DEVELOPMENT
AND EDUCATION PAKISTAN

CODE PAKISTAN

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CODE PAKISTAN

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1. Introduction

It is important that we are aware of the risk of, and means of enforcing, the rules against fraud, bribery and corruption. This document sets out CODE Pakistan's policy for detected or suspected fraud, incorporates best practices within the field regarding counter-fraud measures and takes account of the latest legislation.

2. Definitions

- **Fraud** is theft by deception. It is any deliberate intent to permanently deprive a person or organization of money or goods through the falsification of any records or documents.
- **Bribery** is the accepting of gifts, money, hospitality or other favours in return for providing something of value to the briber
- **Corruption** is where someone is influenced by bribery, payment or benefit in kind to unreasonably use their position to give some advantage to another.
- **Theft** includes any misappropriation, stealing, malicious damage, and actual or attempted break-in.

CODE Pakistan already has procedures in place that reduce the likelihood of fraud, bribery or corruption occurring. These include appropriate policies, procedures, rules and regulations, a system of internal control and a system of risk assessment. In addition, CODE Pakistan tries to ensure that a risk (and fraud) awareness culture exists in the organisation.

Although CODE Pakistan **President and Vice President** hold primary responsibility for preventing fraud, bribery and/or corruption, it is recognized that all CODE Pakistan employees, members, volunteers and other individuals have a part to play in ensuring their efficacy. It is expected that CODE Pakistan employees at all levels will lead by example in acting with the utmost integrity and ensuring adherence to all relevant regulations, policies and procedures. A culture of openness, honesty and probity is strongly encouraged.

3. CODE Pakistan's Policy

CODE Pakistan is committed to maintaining an honest, open and well-intentioned atmosphere within the organisation. It is therefore also committed to the elimination of any fraud, bribery or corruption and to the rigorous investigation of any such cases.

CODE Pakistan expects anyone having any reasonable suspicions of fraud, bribery or corruption to report them. It recognises that whilst cases of theft are usually obvious, there may only be a suspicion of fraud, bribery or corruption and thus employees must report any concerns to their manager or other suitable persons, who can then ensure that CODE Pakistan's procedures are followed.

It is also CODE Pakistan's policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions. All employees can

therefore be confident that they will not suffer in any way as a result of reporting, in good faith, reasonably held suspicions of fraud, bribery or corruption.

4. **Roles and Responsibilities**

This section states the roles and responsibilities of different individuals in reporting fraud, bribery or corruption.

4.1 **Employees**

Employees are expected to act in accordance with CODE Pakistan's rules regarding Conflicts of Interest as set out in the Employee HR Policy. Employees also have a duty to protect the assets of CODE Pakistan, including information and goodwill as well as property.

CODE Pakistan's policies, procedures, rules and regulations place an obligation on all employees to act in accordance with best practices.

4.2 **Managers/Coordinators**

Managers/Coordinators must be vigilant and ensure that procedures to guard against fraud, bribery and corruption are followed. Managers are expected to establish an anti-fraud culture within their team and ensure that information on procedures is made available to all their employees. They should identify the risk of fraud within their section and consider the adequacy of preventative controls.

Managers/Coordinators should be alert to the possibility that unusual events or transactions could be symptoms of fraud. Where they have any doubt, they must seek advice from their immediate manager or **Vice President/President**.

All cases of theft whether of CODE Pakistan or visitor property must be reported to **Vice President/President**. Similarly, any case of actual or suspected fraud or corruption must be reported to **Vice President/President**.

4.3 **Members, Officers and Volunteers**

Members and volunteers are subject to the same high standards of accountability as employees and are required to declare and register any interests that might potentially conflict* with those of CODE Pakistan.

If any member, officer or volunteer of the CODE Pakistan has a financial, commercial, personal or other interest, either direct or indirect, in any contract, proposed contract or other matter, and is present at any meeting at which that contract or other matter is the subject of consideration, he or she is required, as soon as practicable after the meeting's commencement, to disclose the fact, *and shall be prohibited from taking part in the consideration or discussion of the contract or other matter or to vote on any question with respect to it.*

Interests such as the following shall be disclosed, although the list is not exhaustive:

- any employment or income received from work undertaken by CODE partners, vendors and consulting firms working under contract with CODE

- any income received from CODE Pakistan as a partner, director or employee within a firm;
- any sponsorship personally received;
- any contracts with CODE Pakistan for the provision of services or goods for profit;
- any interests in any corporate bodies which do business with the CODE Pakistan

Any interest which any close members of the family of the member, officer or volunteer may have in these matters shall also be declared when matters or issues are discussed which could affect their financial position *

For the record, and for openness and scrutiny, a Register of Interests is maintained, in which the interests of those persons referred to in this section shall be declared in writing. Written disclosures shall be entered in the Register, which shall be maintained by the **Administration Officer**

5. **Reporting Fraud, Bribery or Corruption**

This section outlines the action to be taken where fraud, corruption or other illegal acts involving dishonesty, are discovered or suspected. Reporting all frauds and irregularities is essential to ensure:

- consistent treatment of information;
- proper investigation by an independent and experienced team;
- the optimum protection of CODE Pakistan's interests.

Any actual or suspected instance of fraud or corruption must be reported to **Vice President/President**. immediately, with copies of any documents which are relevant. It is essential that individuals act at the time of their concerns, as time is likely to be of the utmost importance to prevent further loss to CODE Pakistan. However, individuals must not confront any individual that they suspect directly, nor must they contact the police directly.

If an employee suspects their line manager, the employee should report the suspicions to someone more senior. If the suspicion involves an executive director, the matter will be reported to **Board of CODE Pakistan**.

6. **Police Involvement**

Where financial impropriety is discovered, CODE Pakistan's expectation is that the relevant government departments will be involved. Any referral to the government departments will not prohibit action from being taken under CODE Pakistan's Disciplinary Policy* or Procedure*.

7. **Unfounded Allegations**

All staff receive statutory protection of sharing information for organization best interest. Staff raising genuine concerns which, following investigation, prove unfounded, will be informed of the outcome. Any employee who knowingly discloses false/misleading

information or makes malicious allegations, will not be protected by statutory provisions and will be subject to investigation and disciplinary action as appropriate.

8. **Warning Signs**

Whilst by no means being proof on their own, the circumstances below may indicate fraud, and should therefore raise suspicions:

- altered documents (correcting fluid, different pen or handwriting);
- claim form details not readily checkable;
- changes in normal patterns, e.g. of cash takings or travel claim details;
- text erratic or difficult to read or with details missing;
- delay in completion or submission of claim forms;
- lack of vouchers or receipts in support of expense claims, etc;
- employees seemingly living beyond their means;
- employees under constant financial or other stress;
- employees choosing not to take annual leave (and so preventing others from becoming involved in their work), especially if solely responsible for a 'risk' area;
- complaints from the public or from employees;
- insistence on dealing with a particular individual

It is an offence under the Bribery* Act 2010 for you to corruptly accept any gift or consideration as an inducement or reward for doing, or refraining from doing, anything in your official capacity, or showing favour or disfavour to any person in your official capacity.

Furthermore, under the HR policy, any money, gift or consideration received by you from a person or organisation holding, or seeking to obtain, a contract with CODE Pakistan, will be deemed to have been received corruptly unless you prove to the contrary. It is therefore essential for you to declare any gifts or considerations received from **Vice President/President** and to obtain written approval for the retention of the gift. Such approval is to be recorded in a separate log sheet.

9. **Revision of Policy**

CODE Pakistan reserves the right to amend and/or withdraw this policy from time to time for any reason, including without limitation, to take account of changes in the law, best practice and/or operational requirements.