



Integrated Development Focus(IDF-S)

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Anti-Bribery and Anti-Corruption Policy Document

“IDF takes a zero-tolerance approach to bribery and corruption and we are committed to conducting our business in an honest and ethical manner. We have adopted this policy to communicate this message and to assist those working for us to uphold it.”

1. Preamble:

The Anti-Corruption Policy (the 'Policy') of Digital Empowerment Foundation (DEF) has been developed in accordance with Code of Conduct, charters, policies, rules and regulations adopted by IDF

The Policy reflects the commitment of IDF and its management for high ethical standards doing open and fair business for improving the organizational culture, following the best practices of corporate governance and enhancing the organizational reputation at appropriate levels.

2. Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Organization's business is conducted in a socially responsible manner.

3. Policy statement

Corruption is the abuse of public or private office for personal gain.

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

4. Policy Statement

1) The aims and objectives of the Policy are:

- a) To initiate the steps to reduce the bribery and corruption risks to the business of the Organization by setting out clear guidelines.
- b) To encourage all employees to be vigilant and to act diligently in good faith.
- c) To monitor and investigate instances of alleged corruption.
- d) To take firm and vigorous action against any individual(s) involved in corruption.
- e) To minimize the risk of involvement of all employees and Directors in corruption related activities;
- f) To form a common understanding for all stakeholders that DEF prevents corruption in any form;
G To set responsibility for the employees of IDF to know and comply with the principles and requirements of the Policy, the key rules of the applicable anti-corruption laws, as well as adequate procedures to prevent corruption

5. Scope

This policy applies to all individuals working at all levels and grades, including Directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, business partners, and third-party representatives anywhere in the world, **or any other person associated with us, wherever located who may be acting on behalf of IDF`.**

6. Principles:

- 1) The Members of the Board of Directors the Board members and Senior Managerial Personnel of IDF should form the ethical standard of uncompromising attitude to all forms and demonstration of corruption at all levels setting the example by their own behavior.
- 2) IDF openly expresses its zero tolerance to corruption; welcomes and encourages compliance with the principles and requirements of the Policy by all grantees and sub grantees, contractors, employees, associated parties/companies, its managerial bodies and other person.
- 3) In this policy, third party means any individual or organization as associate comes into contact with IDF and includes any potential clients, customers, distributors, business contacts, government and public bodies including their respective representatives.

7. Coverage

- 1) This policy covers:
 - a) Bribes;
 - b) Gifts and hospitality;
 - c) Facilitation payments;
 - d) Political contributions;
 - e) Charitable conditions

2 Bribes

Employees must not engage (give or take) in any form of bribery, either directly or through any third party (such as an agent or distributor

- b) Bribery here would mean dishonestly persuade (someone) to act in one's favour by a gift of money or other inducement; dishonestly persuade (someone) to act in one's favour by a gift of money or other inducement.

Bribe includes "anything of value" such as, gift cards, home repairs, tickets to a theater or sporting event, guest passes to a private club, a no-bid contract, a summer job for a teenage family member, free limo/courtesy car service rides, and more

- 3) Gifts and hospitality
 - a) Employees must not offer or give any gift or hospitality:
 - i) which could be regarded as illegal or improper, or which violates DEF's OR the recipient's policies/ethics; or
 - ii) to any public employee or government officials or representatives, or politicians or political parties;

- b) Employees may not accept any gift or hospitality from our business partners (donors and sub-grantees) if:
 - i) it exceeds INR 500/- in value for each individual gift
 - ii) it is in cash; or
 - iii) there is any suggestion that a return favor will be expected or implied.
- c) If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared by the employee to his manager. If employee fails to declare this then it shall be deemed violation of policy and the matter shall be reported to the anti-corruption committee.
- 4) Facilitation payments and kickbacks
 - a) IDF representatives may not make any facilitation payments - these are a form of bribery made for the purpose of expediting or facilitating the performance of a public official or of a private official, and not to obtain or retain business or any improper business advantage.
- 5) Charitable contributions
 - a) Charitable support and donations are acceptable (and indeed are encouraged), whether of in kind services, knowledge, time, or direct financial contributions.
 - b) However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery.
 - c) We only make charitable donations that are legal and ethical under local laws and practices.
- 6) Exceptions:
 - a) We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another.
 - b) The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.
 - c) As far as possible, it is strongly recommended that receipts of gifts are reported to your superior / admin department and have it formally recorded in organization records.
- 9) Internal Controls & Compliance Monitoring
- 10) Compliance Measurement
 - a) Compliance with Organization's policies is required. Compliance to this policy is verified through various methods, including but not limited to, reports from available business tools, internal and external audits, self-assessment, and/or feedback to the policy owner.

- b It is the Organization's policy to maintain accurate, reasonably detailed records that fairly reflect its transactions and disposition of assets, regardless of whether the transactions are domestic or international. Therefore, Organization's Personnel are prohibited from making any false or misleading statements in Organization's books and records for any reason
- 11) Regular audits would include a review of the Organization's books and records maintained by the Finance Department pertaining to the entertainment, gift, and travel expenditures by Personnel on behalf of the organization. As necessary, the regular audits would encompass records pertaining to social payments and donations to charities.
- 12) Exceptions: Any exceptions to the Anti-Corruption and Bribery policy must be approved by the CEO of the organization.
- 13) Non-Compliance: Deviations or non-compliance with this policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions, up to and including termination, as allowed by local laws.

10 Ramifications of Misconduct

How to make a complaint

A person wishing to make a complaint on any suspected case of bribery can consult and file a complaint with the Anti-Corruption Committee. The complaint should be made in writing and addressed to Chairperson of committee within 5 working days of any such incident.

The constitution of the Committee shall be-

- Chair of the "Anti-Corruption" Committee
- Internal Officers- 2 Members from Middle Level Management
- HR Department Head, IDF

Anti corruption committee

S.NO	Name	Designation	Role in Committee
1	Ibrahim A. Ibrahim	BOD Chairman	Chairperson
2	Paul Vet Otheyo	Independent Consultant	Presiding Officer
3	Lul Mohamed Abdi	Board member	Internal Officer
4	Ali Mohamed Noor	Executive Director	Supporting Officer
5	Ahmed Abdi	Program manager	Supporting officer

Once a complaint has been filed

Investigation

Once a complaint has been filed an investigation will be undertaken immediately. In instances where there is an alleged respondent, the respondent will be notified immediately. The complainant and the respondent will both be interviewed along with any individuals who may be able to provide relevant information.

Timelines

IDF will investigate all complaints immediately and will work towards the prompt resolution and such a dispute. The first round of investigation and conclusion shall be arrived at within 10 working days from the date of filing of the complaint.

Fairness

All complaints will be investigated in the same manner with the aim of promoting, fairness and equality.

Confidentiality and the Right to Privacy

IDF will preserve the confidentiality of all individuals involved in such complaint. The preservation of confidentiality may be affected by the employer's duty to prevent such activities in/at DEF and by the alleged respondent's right to know the nature of the complaint being made against them and who has made it so that they can respond.

If the investigation fails to find evidence to support the complaint, no documentation concerning the complaint will be placed on the file of the respondent. DEF will retain all documentation for 12 months for informational purposes in the event that there is an internal appeal or a complaint filed with an outside agency.

Outcomes and Remedies

IDF will act swiftly to ensure that such practices are stopped as soon as possible and may remedy the situation in a number of ways. The main concerns of the employer will be to ensure that no such incident is repeated in future.