



RIGHTS INSTITUTE FOR SOCIAL EMPOWERMENT- RISE

ANTI- CORRUPTION POLICY

JUNE 2016

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ANTI-CORRUPTION POLICY

1. Introduction

Just like any other organization, RISE operates in corruption risky environments due to the nature of operations undertaken. RISE is involved in procurement, employment and other transactions where chances and risks for bribery and corruption are high.

It is RISE's wish to condemn corruption in strongest terms among its staff and any other person dealing in the name of the organization. Through this policy, RISE undertakes not to deal in any corrupt way and to support in dealing with the vice.

2. Anti-corruption policy statement

RISE has a no tolerance policy towards bribery and corruption. This policy extends to all the organizations business dealings and transactions in Malawi and other countries in which we or our partners operate. This policy is given force in a detailed anti-corruption program which is constantly revised to capture changes in law, reputational demands and changes in the business. All employees and partners are required to comply with this policy.

Employees will be given a copy of this policy to sign in the agreement with the contents and representation of compliance and agreement.

3. Anti-corruption program in RISE

The anti-corruption program is an integrated part of the overall governance system of RISE.

3.1 Responsibility

The directors of RISE are responsible for monitoring the overall compliance with the anti-corruption program. The directors of our partners are responsible for monitoring compliance with the anti-corruption program in their respective organizations and these include CBOs that we operate with.

3.2 Communication and training

The anti-corruption program will be communicated to employees oral and in writing when assignments are made. All employees will attend training courses explaining the anti-corruption program. The anti-corruption policy statement and program will be available in all RISE information sources and other relevant websites. The policy statement shall be published in the annual reports.

3.3 Advisory and complaints channels

All suspicions of economical frauds, bribery and corruption and should immediately be reported as stated in the Code of Conduct and anti-fraud policy. The anonymity of the whistleblower shall be respected in this case.

3.4 Project contracts

No RISE project shall be executed unless a project contract is signed by both RISE and the implementing partner in case of future capacity to sub grant or source for any service from other suppliers. The project contract shall be based on RISE standard project contract. In other situations this will be referred to as MOU or TOR depending on the nature of agreement with the partners.

3.5 Tender processes

Special attention shall be given to major purchases. RISE will follow other policies including procurement policy, financial policy and procedure manual, anti-fraud policy and other human resource related policies to ensure that there is no loophole for corruption.

3.6 External audits and audit agreements

For all audits, the International Auditing Standards shall be followed. All project audit reports shall be written in English. All projects sponsored by governmental bodies or large private donors shall be audited in the field no later than six months after project termination. The overall RISE operation will in addition be audited in connection with the annual audit of RISE. For smaller private projects the audit will be included in the annual audit of RISE. Audit will also happen depending on donor requirements for individual projects.

3.7 Review of financial management and accounting procedures

The director of RISE or his representative shall annually review the financial management and accounting procedures together with management team members. The review shall follow the control questions to be designed. The annual review shall be documented and made available for the board and auditor.

4. Consequences of violation

All forms of corruption will result in immediate investigation and possibly suspension or termination/ dismissal. Personnel found guilty in bribery will be made known to all other employees for preventive purposes. In other circumstances, the anti-corruption bureau may be involved in such matters.

5. External communication

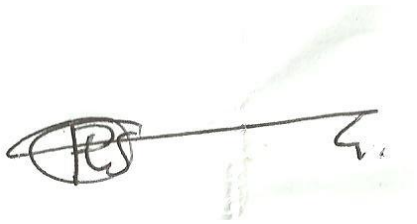
All incidences of corruption or suspected corruption shall result in a report stating the severity and scope of the issue and actions taken thereafter. All reports shall be sent to the director, and a summary of reports shall be made available on request to other parties.

THIS POLICY IS HEREBY APPROVED AND ENDORSED BY THE RISE BOARD OF TRUSTEES HEREUNDER SIGNED:

Name: Mr. Peter L.S Chikakula

Position: Board of Trustees Vice Chairperson

Signature:

A handwritten signature in black ink, consisting of a stylized initial 'P' inside a circle, followed by a horizontal line and a small flourish.