



ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Kabalega Foundation is committed to conducting its operations with the highest standards of integrity and ethics. We recognize that corruption and bribery undermine trust, damage reputations, and hinder the Foundation's ability to achieve its mission. As part of our commitment to ethical behavior, this **Anti-Corruption and Anti-Bribery Policy** establishes clear guidelines to prevent corruption and bribery in all our activities, including those involving staff, partners, contractors, and external stakeholders.

1. Purpose

The purpose of this policy is to outline the Foundation's zero-tolerance stance towards corruption and bribery, to ensure compliance with all applicable laws, and to maintain a transparent and accountable work environment. This policy applies to all staff, volunteers, board members, contractors, consultants, and anyone acting on behalf of Kabalega Foundation.

2. Definition of Corruption and Bribery

For the purposes of this policy:

- **Corruption** refers to the abuse of power, position, or influence for personal gain, often resulting in the misuse of resources or decision-making authority.
- **Bribery** refers to offering, giving, receiving, or soliciting something of value (e.g., money, gifts, services, or favors) to influence the actions of another person, typically a government official, business partner, or other third party, in order to secure an unfair advantage.

3. Prohibited Activities

Kabalega Foundation prohibits all forms of corruption and bribery, including but not limited to:

- Offering or accepting bribes, kickbacks, or other financial incentives to gain an advantage in any transaction.
- Offering gifts, services, or entertainment to influence decisions or gain favor in any context.
- Making political or charitable contributions with the intention to influence a decision or secure favorable treatment.
- Engaging in any activity that might give the appearance of corrupt conduct or improper influence.

4. Responsibilities of Staff and Stakeholders

All staff, board members, volunteers, contractors, and other stakeholders involved with Kabalega Foundation are responsible for:

- **Compliance:** Ensuring that their actions adhere to the anti-corruption and anti-bribery principles outlined in this policy.
- **Reporting:** Promptly reporting any suspected or actual violations of this policy to the designated Compliance Officer or the relevant authority within the Foundation.
- **Training and Awareness:** Actively participating in training sessions on anti-corruption and anti-bribery practices, and ensuring that they understand their responsibilities under this policy.

5. Gifts and Hospitality

Kabalega Foundation understands that in certain circumstances, gifts or hospitality may be exchanged as part of normal business practices. However, these must be:

- **Reasonable and Modest:** Gifts and hospitality should not exceed a value that could influence or appear to influence any business decision or action.
- **Transparent:** Any gift or hospitality offered or received must be fully documented, with full disclosure to the Foundation.
- **Infrequent and Appropriate:** Gifts or hospitality should not be offered regularly and must be appropriate to the context, such as the culture of the region or country where the gift is given.

Staff should avoid accepting or offering gifts that could create a sense of obligation or appear to be a form of bribery.

6. Reporting and Whistleblower Protection

Kabalega Foundation encourages all employees and stakeholders to report any suspected instances of bribery or corruption. We have implemented a **Whistleblower Policy** to protect those who raise concerns in good faith from retaliation, discrimination, or any form of harm. Reports can be made anonymously if necessary.

All reports of corruption or bribery will be investigated promptly, and appropriate disciplinary actions will be taken in accordance with the Foundation's procedures.

7. Due Diligence and Third-Party Relationships

Kabalega Foundation will conduct thorough due diligence on all third-party partners, contractors, and suppliers to assess the risk of corruption or bribery. This includes:

- Ensuring that any third-party partner shares the Foundation's commitment to ethical business practices.
- Including anti-corruption and anti-bribery clauses in all contracts with external parties.
- Monitoring and auditing third-party relationships to ensure ongoing compliance with this policy.

8. Consequences of Policy Violations

Violations of this policy may result in disciplinary action, including:

- Termination of employment or contractual agreements.
- Legal action, where applicable.
- Reporting to regulatory authorities if required by law.

Individuals found to be in violation of this policy may face legal consequences, including criminal prosecution, depending on the severity of the offense.

9. Policy Review and Updates

This policy will be reviewed regularly and updated as necessary to ensure it remains in compliance with applicable laws and reflects the evolving ethical standards and needs of the Foundation. Any changes or updates to the policy will be communicated to all staff, volunteers, and stakeholders.

10. Implementation and Training

The **Compliance Officer** will be responsible for overseeing the implementation of this policy and ensuring that appropriate training is provided to all employees and stakeholders. Regular refresher training will be conducted to reinforce the principles of this policy and ensure ongoing compliance.

Kabalega Foundation has a **zero-tolerance approach** to corruption and bribery. We are committed to upholding the highest standards of integrity and ethics in all our operations and relationships. By adhering to this policy, we aim to maintain trust with our donors, partners, beneficiaries, and the communities we serve, ensuring that our work is not undermined by unethical practices.

All staff, volunteers, and partners have a shared responsibility to ensure that corruption and bribery have no place in the Foundation's work. We encourage all individuals to actively contribute to maintaining a culture of honesty, transparency, and accountability.

Signed:



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Date: 04/01/2020

Executive Chairperson