



IBOLDA Health Int'l LTD.RC.1236700

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**HEALTH INTERVENTION, CONSULTANCY, RESEARCH AND  
COMMUNITY DEVELOPMENT**

## **ANTI-CORRUPTION, BRIBERY AND FRAUD POLICY**

### **1. Policy statement**

- 1.1 It is our policy at Ibolda health international to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to corruption, bribery, fraud or other financial irregularity and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate, and in implementing and enforcing effective systems to counter any acts of bribery or corruption.
- 1.2 Ibolda Health international will uphold all laws relevant to countering bribery, corruption and fraud. We remain bound by the laws of Nigeria, in respect of our conduct both at home and abroad.
- 1.3 The purpose of this policy is to:
  - (a) set out our responsibilities and of those working for us, in observing and upholding our position on corruption, bribery, fraud or other financial irregularity; and
  - (b) provide information and guidance to those working for us on how to recognise and deal with corruption, bribery and fraud issues.
- 1.4 Bribery legislation has extensive global reach, and the Ibolda Health Int'l Ltd. and individuals working for the Ibolda Health Int'l Ltd. can be liable no matter where in the world the unlawful act takes place.
- 1.5 In this policy, **third party** means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers and government and public bodies, including their advisors, representatives and officials, politicians and political parties.
- 1.6 Ibolda Health Int'l Ltd. procedures and regulations such as:
  - Expenses and Benefits Policy and Procedure
  - Whistleblowing Policy
  - Financial Regulations
  - Staff Disciplinary Procedure
  - Anti-Money Laundering Policy
  - Donations Policy and Procedure

1.7 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. Who is covered by, and must comply with this policy?

2.1 This policy applies to all individuals, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **workers** in this policy).

2.2 It is a condition of employment that employees will abide by the rules and policies made by the Ibolde Health Int'l Ltd. from time to time, which includes this policy. Any alleged failure to follow this policy will be investigated (and, where appropriate, action taken) in accordance with the Ibolde Health Int'l Ltd.'s disciplinary procedures. We reserve our right to terminate our contractual relationship with other workers and organisations if they breach this policy.

## 3. Definitions of Bribery, Corruption, Fraud or other Financial Irregularity

3.1 A **financial irregularity** may be defined as the breach of the standards of financial integrity required by the Ibolde Health Int'l Ltd., including a breach of the Financial Regulations

Irregularities fall broadly within the categories set out below. These definitions are not intended to be exhaustive, but give an indication of the range of matters covered by this policy:

3.2 **Bribery** is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

3.3 An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

3.4 A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

3.5 **Facilitation payments**, also known as "back-handers" or "grease payments" are unofficial payments made to secure or expedite a routine or necessary action (for example, by a government official).

3.6 **Kickbacks** are typically payments made in return for a business favour or advantage.

3.7 **Corruption** is the abuse of entrusted power or position for private gain.

3.8 **Fraud** is intentionally deceiving someone in order to gain an unfair or illegal advantage or to deprive someone of their legal rights. Fraud generally implies an act of theft, the intentional distortion of financial statements or other accounting records by persons internal or external to the Ibolde Health Int'l Ltd. (or in collusion) to conceal the misappropriation of assets, or otherwise, for gain. Ibolde Health Int'l Ltd. will investigate all reports of fraud or potential fraud and will make every attempt to

recover its losses and restore assets. Ibolta Health Int'l Ltd. will report fraud or attempted fraud, as appropriate to the police.

3.9 **Theft** is the dishonest taking of property belonging to Ibolta Health Int'l Ltd., a sub-contractor employed by Ibolta Health Int'l Ltd.

3.10 Ibolta Health Int'l Ltd. could also be liable if someone who performs services for it, for example an employee or agent, pays a bribe on behalf the Ibolta Health Int'l Ltd. for the purpose of getting/keeping business or to gain a business advantage and Ibolta Health Int'l Ltd. did not have adequate procedures in place to prevent such conduct.

## **4. What is not acceptable?**

4.1 It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure or approval process;
- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

## **5. Facilitation payments and kickbacks**

5.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

5.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the Ibolta Health Int'l Ltd.

5.3 All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

## **6. Gifts and Hospitality**

6.1 This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality (given and received) to or from third parties for legitimate purposes, such as building relationships, improving or maintaining our image or reputation.

6.2 The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it complies with the Ibolta Health Int'l Ltd.'s current Financial Regulations and, where required is reported to the appropriate person in accordance with the Expenses and Benefits Policy and Procedure;
- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits, for example during contractual negotiations or a tender process;

- it complies with local law;
- it is given or received in Ibolda Health Int'l Ltd.'s name, not in your name;
- it is appropriate in the circumstances and is not unduly lavish or extravagant.
- it is not given or received in cash (or a cash equivalent);
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the Ibolda Health Int'l Ltd.

6.3 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. 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. Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and partners will usually be acceptable.

## **7. Donations**

7.1 We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of Ibolda Health Int'l Ltd.

## **8. Your responsibilities**

8.1 You must ensure that you read, understand and comply with this policy.

8.2 The prevention, detection and reporting of bribery, fraud and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

## **9. Risk Management**

9.1 It is important that an assessment is undertaken of the risks of bribery, fraud or corruption occurring, or of the perception arising that such acts may have occurred. This enables areas of specific vulnerability to be identified and mitigating actions to be put in place which are proportionate and prioritised, recognising that risks will vary across Ibolda Health Int'l Ltd., and may depend on the location of the activity.

9.2 The risk of bribery, fraud or corruption occurring should therefore be addressed through Ibolda Health Int'l Ltd.'s risk management processes. Whilst this forms part of Ibolda Health Int'l Ltd.'s institutional risk assessment processes, it is also important that assessment of risk is done at all levels

## **10. Record-keeping**

10.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

10.2 You must declare and keep a written record of all hospitality or gifts accepted or offered in accordance with Ibolda Health Int'l Ltd.'s Financial Regulations and Expenses and Benefits Procedures. You must also ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with such regulations and the manual.

10.3 All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off book" to facilitate or conceal improper payments.

## **11. How to raise a concern**

- 11.1 You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery, fraud, corruption or other irregularity, or if you have any other queries, these should be raised by following the procedure set out in this document. You should raise a concern as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 11.2 For example, if a supplier, agent or client or potential supplier, agent or client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business, you should raise concerns in accordance with this policy.

## **12. What to do if you are a victim of bribery, fraud or corruption**

- 12.1 It is important that you follow the procedure set out by Ibolde Health Int'l Ltd. as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of financial irregularity.

## **13. Protection**

- 13.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 13.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery, fraud or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment and you are:
- (a) an employee, you should raise it formally using our Grievance Procedure ; or
  - (b) a person external to the organisation, you should raise it formally using our External Complaints Procedure

## **14. Training and Communication**

- 14.1 Training on this policy is available to all workers to whom this policy applies and is compulsory for all staff working in higher risk areas and budget holders to ensure that they are aware of their obligations and responsibilities. If you wish to undertake appropriate training, please contact Ibolde Health Int'l Ltd Office.
- 14.2 Our zero-tolerance approach to corruption, bribery and fraud must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

## **15. Who is responsible for the policy?**

- 15.1 Ibolde Health Int'l Ltd. has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 15.2 Ibolde Health Int'l Ltd. has primary and day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are

responsible for ensuring those reporting to them are made aware of, understand and comply with this policy.

- 15.3 Ibolde Health Int'l Ltd. will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and financial procedures will be subject to regular audits to promote best practice in countering corruption, bribery and fraud.
- 15.4 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

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