



## **ANTI-CORRUPTION POLICY**

### **1.0 PURPOSE**

The purpose of the Alliance for Financial Inclusion's Anti-Corruption Policy ("Policy") is to set out requirements and measures to counteract corruption and any irregularities in the operations of the Alliance for Financial Inclusion (AFI) towards fulfilling the mandate and objectives of AFI. This policy applies to the Board of Directors, management and staff of AFI.

### **2.0 GENERAL REQUIREMENTS**

2.1 AFI prohibits activities involving bribery, corruption and the exercise of improper influence in all jurisdictions in which AFI operates. This Policy applies to dealings with stakeholders including members, public and private sector partners, consultants, vendors, suppliers, and other external stakeholders.

2.2 AFI defines corruption as an abuse of trust, power or position for improper gain. Corruption includes, among other things, taking and giving bribes - including bribing a foreign public official - embezzlement, conflict of interest and nepotism.

2.3 AFI directors, management and staff are expected to have a good knowledge about the negative consequences of corruption and how to identify, pay attention to and manage corruption risks, and reporting actual or suspected acts of corruption.

### **3.0 STRATEGY DEVELOPMENT PROCESS**

AFI shall acknowledge and take into account corruption risks and corruption's negative impact in AFI's initiatives and activities throughout its strategy development process, including:

- the review of operating environment;
- preparation of strategy documentation;
- the implementation of the strategy,
- the establishment of annual operational and action plans; and
- the monitoring and evaluation of strategy implementation and annual plans.

### **4.0 RECEIPT AND DISBURSEMENT OF FUNDS**

Corruption risks shall be taken into consideration when carrying out activities involving the receipt or disbursement of funds. AFI requires the following measures to be adhered in practice for counteracting corruption risk:

- a provision on prohibiting corruption in agreements;
- prevention, assessment and management of corruption risks during the agreement period;
- reporting actual or suspected acts of corruption; and
- management of breaches of agreement and demands for repayment for the incorrect use of funds, corruption or other irregularities.



**5.0 DUTY TO REPORT**

5.1 A staff shall report any actual or suspected acts of corruption immediately to the AFI Executive Director. Anonymous reporting of suspected corruption is possible. A staff who reports actual or suspected corruption or other irregularities may not be subjected to retaliation or harassment. A staff who retaliates against a person who reported a violation in good faith will be dealt with in accordance to AFI Disciplinary Procedures and any applicable law.

5.2 In the case of the Executive Director, he/she shall report any actual or suspected acts of corruption to the Chair of the Board of Directors or the Vice-Chair in the absence of the Chair.

5.3 A member of the Board of Directors shall report any actual or suspected acts of corruption to the Chair of the Board and in the case of the Chair of the Board, he/she shall report any actual or suspected acts of corruption to the Vice-Chair of the Board.

**6.0 GUIDELINES**

This Policy shall be read and applied together with the AFI Anti-Corruption, Gifts and Entertainment Guidelines.

*Approved by the Board of Directors on 19 April 2018.*