



ANTI-BRIBERY AND CORRUPTION POLICY

1.1 PURPOSE AND OBJECTIVE

We are Harvest Hope Africa Ltd (“us”, “we”, “our”).

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

It is our policy to conduct all our charity 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 and Corruption.

We will uphold all laws relevant to countering Bribery and Corruption in all the jurisdictions in which we operate. However, we remain bound by the laws in Australia in respect of our conduct both at home and abroad.

We take our legal responsibilities very seriously, understanding persons being found to have taken part in Bribery or Corruption could face imprisonment, fines and face damage to their reputation.

2.1 DEFINITIONS

Bribery	means the offering, promising, giving, requesting, authorising or receiving of anything of value (whether financial or other advantage) directly or indirectly to another person (such as a public official, Third Party, supplier, customer etc) with the intention of influencing or rewarding improper performance. Bribery be ‘active’ in which a person offers or gives something of value to influence performance or obtain an unfair advantage or ‘passive’ in which a person receives, attempts to receive, or requests something of value in exchange for improper performance.
Corruption	means an act or omission for an improper or unlawful purpose, which involves the abuse of a position of trust or power.
Employee	includes all staff working at all levels and grades, whether paid or voluntary, permanent, fixed-term, casual or temporary, consultants, contractors, trainees, seconded staff, homeworkers, and agency staff, interns, agents, sponsors, or any service provider employed by a Third Party and have access to our IT networks and systems.
Facilitation Payment	facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.
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.
Volunteer	includes any person working in a volunteer capacity for our organisation.

SCOPE

2.1 Who is covered by the policy?

This policy applies to our, Directors, Employees, Volunteers and Third Parties. This policy covers any activity or behaviour undertaken during the course of, or in connection with, employment or acting on behalf of our, regardless of the geographical location in which that activity or behaviour occurs.

This policy covers:

- Bribes
- Gifts and Hospitality
- Facilitation payments
- Political contributions

2.2 Bribes

Directors, Employees, Volunteers and Third Parties acting for or on behalf of our organisation must not engage in any form of Bribery or Corruption, either directly or through any third party (such as an agent or distributor).

2.3 Gifts and Hospitality

Directors, Employees, Volunteers and Third Parties acting for or on behalf of us must not offer or give any gift or hospitality:

- which could be regarded as illegal or improper; or
- to any public employee or government official or representative, or politician or political party; or
- which exceeds \$100 in value for each individual gift or \$500 in value for each hospitality event (not to exceed a total value of \$1000 in any financial year), unless in the case of an Employee or Volunteer approved in writing by the Employee's/Volunteer's Manager or in any other case approved by the Board.

Directors, Employees, Volunteers and Third Parties acting for or on behalf of us may not accept any gift or hospitality from our business partners if:

- it exceeds \$100 in value for each individual gift or \$500 in value for each hospitality event (not to exceed a total of \$1000 in any financial year), unless in the case of an Employee or Volunteer approved in writing by the Employee's/Volunteer's Manager or in any other case approved by the Board; or
- it is in cash; or
- there is any suggestion that a return favour will be expected or implied.

Where a Manager's approval is required above, if the Manager is below Director level then approval must be sought from an appropriate Director.

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared in the case of an Employee or Volunteer to the Employee's/Volunteer's Manager or in any other case to the Board and donated to the charity.

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.

Within these parameters, management may define specific guidelines and policies to reflect local professional and industry standards. Where this policy requires written approval to be given, the Company Secretary shall put in place a process to maintain a register of all such approvals.

2.4 Facilitation payments and kickbacks

Our strict policy is that facilitation payments must not be paid. Where a Facilitation Payment is required to protect against perceived or actual immediate danger to personal safety, the following steps must be taken:

- Keep any amount to the minimum;
- Create a record concerning the payment; and
- Report it to your Manager.

In order to achieve our aim of not making any facilitation payments, each Manager will keep a record of all payments made, which must be reported to the Company Secretary, in order to evaluate the business risk and to develop a strategy to minimise such payments in the future.

2.5 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

3 Your responsibilities

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

The prevention, detection and reporting of Bribery and Corruption are the responsibility of all those working for us or under our control. All Directors, Employees, Volunteers and Third Parties acting for or on behalf of us are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your Manager OR one of the Directors as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred or may occur in the future.

Any Director, Employee, Volunteer or Third Party acting for or on behalf of us who breaches this policy will face disciplinary action, which could result in termination of employment or engagement.

4 Record-keeping

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

You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

5 How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether an act constitutes Bribery or Corruption, or if you have any other queries or concerns, these should be raised with your Manager OR with one of the Directors

6 What to do if you are a victim of Bribery or Corruption

It is important that you tell your Manager OR one of the Directors 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 unlawful activity.

7 Protection

Directors, Employees, Volunteers and Third Parties acting for or on behalf of us 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.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in Bribery or Corruption, or because of reporting in good faith their suspicion that an actual or potential Bribery or 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, you should inform your Manager OR one of the Directors immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the company's Grievance Procedure.

8 Training and communication

Training on this policy forms part of the induction process for all new Directors, Employees, and Volunteers. All existing Directors, Employees and Volunteers will receive regular, relevant training on how to implement and adhere to this policy. In addition, all Directors, Employees, and Volunteers will be asked to formally accept conformance to this policy on an annual basis.

This policy and our zero-tolerance approach to Bribery and Corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

9 Who is responsible for the policy?

Our Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief of Operations 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 and understand this policy and are given adequate and regular training on it.

10 Monitoring and review

The Chief of Operations 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 procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

All Directors, Employees, and Volunteers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Directors, Employees, and Volunteers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief of Operations

This policy does not form part of any employee's contract of employment and it may be amended at any time.

Contacts

For questions about this policy, contact the board or the Secretary office@harvesthopeafrica.org.au

This policy was last updated February 2021.