

Anti-Corruption Policy

PEAS' Anti-Corruption Policy is set out below. It is of the utmost importance that the actions of all employees, volunteers, school staff, contractors, suppliers and any other third parties acting on behalf of, or in partnership with, PEAS (including PEAS' Income Generating Activities projects) remain within the provisions of this policy at all times. This will help to ensure that:

1. PEAS' reputation as a trustworthy organisation committed to a 'zero tolerance' approach to corruption is upheld;
2. Our donors continue to support our work;
3. The broader fight against corruption in development is helped not hindered;
4. We as PEAS Staff continue to be consciously and continuously open and transparent in our daily working lives, building trust within the team and with partners.

Definitions

For the purposes of Sections 1 – 9 below and to avoid any doubt, the following definitions apply.

Corruption is defined as any action committed by a person who, by himself/herself or in conjunction with any other person,

- Corruptly solicits or receives, or agrees to receive for himself/herself or for any other person; or
- Corruptly gives, promises or offers to any person whether for the benefit of that person or of another person,
- Possesses, or in any way deals with, or conceals, the proceeds of illegally obtained funds (money laundering).
- Any gratification as an inducement to do, or reward for doing, anything related to any matter or transaction.

Other examples of prohibited practices which are collectively referred to as “corruption” in this policy are but not limited to:

- Fraud, is any act or omission, including any misrepresentation, that knowingly misleads, or attempts to mislead, a party to obtain any financial or other advantage, or to avoid any obligation whether for oneself or for others. Without limiting the foregoing, fraud could involve, among other things, misappropriation of cash or other assets or fraudulent financial or non-financial statements.
- Theft is the unauthorized taking of anything of value that belongs to another individual or entity.
- Collusive practice is an arrangement among two or more parties designed to achieve an improper purpose, including but not limited to, influencing improperly the actions of another party.
- Coercive practice is impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to improperly influence the actions of a party.
- Obstructive practice is deliberately destroying, falsifying, altering or concealing of evidence material to the investigation or making false statements to investigators in order to materially impede a duly authorized investigation into suspect cases of corruption; or acts intended to materially impede the exercise of PEAS' contractual rights of access to information.
- Kick backs, are a personal receipt of a gift from a supplier or potential supplier in return for that supplier being favourably considered for award of contracts at that time or any other time in the future.
- Bribery, is obtaining a personal or PEAS objective through making unauthorised or dishonest personal payment or a gift of any kind to any external party including but not limited to

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government officials.

- Nepotism, is showing undue favouritism towards relatives and friends in relation to PEAS work, including appointing relatives and friends to positions within PEAS when another candidate would be better qualified.
- Money laundering is the conversion, transfer, acquisition, possession or use of property by any person who knows or who may be reasonably presumed to know that such property is derived from criminal activity or from an act of participation in such activity, including the concealment, or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, such property or aiding, abetting and facilitating such acts.

1. Policy

It is the policy of PEAS to conduct its operations ethically and in accordance with the laws of the countries in which it operates, including prohibitions against corruption in all its forms. PEAS requires that all its staff, business partners, agents, consultants, representatives and any other third parties authorised to act on its behalf doing business with PEAS to comply with this policy by conducting business for and on behalf of PEAS in full compliance with all applicable anti-corruption and anti-bribery laws.

This policy applies to all forms of corruption and will be followed for cases of actual, suspected and attempted corruption.

2. The Golden Rule

All PEAS Staff, business partners and contractors or any other persons covered by this policy must never enter into corrupt, fraudulent or nepotistic practices with, or offer, solicit or receive a bribe, to or from, any party in relation to any of PEAS' activities in the UK, Uganda, Zambia, Ghana or elsewhere. These corrupt practices include but are not limited to corruptly giving, paying, promising, offering, or authorising a payment or gift, directly or indirectly through a third party, of anything of value to a person covered by this policy to persuade such person to help PEAS, or any other person, obtain or keep business or obtain any other improper advantage.

3. Single Exception to The Golden Rule

The only circumstance in which The Golden Rule does not apply is where a payment is made under severe duress, for example where there is a genuine risk of loss of life, limb or liberty, or other violence, resulting from any failure to pay a bribe.

4. Facilitation Payments

Facilitation payments (e.g. small to medium sized payments made with the intention of improperly influencing the outcome of routine actions and/or decisions from an external party) are to be considered as being no different to any other bribe and so are also prohibited under The Golden Rule in exactly the same fashion as a bribe.

5. Hospitality

The giving or receipt of any hospitality (gifts-in-kind e.g. free travel, accommodation etc.) to or by PEAS staff is likewise prohibited as a bribe under The Golden Rule in all cases where such hospitality is given with the intention, known to the recipient, of securing a specific practical, commercial or economic advantage for the individuals involved.

6. Record of Hospitality

Any 'legitimate' hospitality (i.e. hospitality that is not prohibited by The Golden Rule) given to or received by PEAS Staff must nevertheless be reported as soon as possible to the relevant line manager, who must record this in the hospitality register in the relevant PEAS country office. No hospitality given or received should exceed the amount stated by each Country Office.

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7. Vigilance

Any member of PEAS Staff aware of or suspecting any corruption or other breach of The Golden Rule by any member of PEAS Staff, or any of PEAS' business partners or contractors, must report this immediately to the relevant Country manager, who must ensure that PEAS' CEO is duly informed. In cases whereby this is not possible, the PEAS CEO must be informed immediately.

8. Due Diligence

The relevant PEAS Staff must take all reasonable action to ensure that PEAS' business partners, representatives, agents, consultants and contractors or any other third parties acting on behalf of PEAS comply fully and at all times with The Golden Rule. They must report any doubts in this regard to the relevant line manager as soon as possible.

9. Nepotism

No member of PEAS staff should ever show undue favouritism towards relatives and friends in relation to PEAS work or appoint relatives and friends to positions within PEAS when another candidate would be better qualified. In order to protect staff, where an employee has a family connection or other close personal relationship with an applicant, they should declare that as soon as they become aware of that person's application to PEAS and should thereafter not be involved in decisions around the short listing or appointment of that applicant.

11. Breach of This Policy

11.1 Any member of PEAS Staff who is found to have acted in breach of this Policy will be subject to disciplinary action, which may lead to the member of staff's dismissal.

11.2 PEAS will attempt, where feasible, to seek recovery of resources and/or property lost as a result of breaches of the policy using all means at its disposal, including legal action where appropriate. For employees, PEAS may make deductions from salaries and other emoluments. In respect of cooperating partners and vendors, PEAS would seek refund or recovery or withhold relevant amounts from subsequent disbursements when legally feasible.

Attestation of Commitment to the PEAS Anti-Corruption Policy

I, _____, hereby declare that I have read the PEAS Anti-Corruption Policy, understand it and will abide by it.

Signature: _____ Date: _____