

**KULIKA UGANDA**  
**ANTI-CORRUPTION AND BRIBERY POLICY**  
**Reviewed DECEMBER 2024**

**POLICY STATEMENT**

It is Kulika Uganda's policy to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to corruption and bribery and 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.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on zero tolerance to corruption and bribery.
- provide information and guidance to those working for us on how to recognise and deal with corruption and bribery issues.

**WHO IS COVERED BY THE POLICY?**

This policy applies to all individuals working at all levels and grades, including senior managers, officers, partners, employees (whether permanent, fixed-term or temporary), consultants, contractors/associates, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with KULIKA, (collectively referred to as "**workers**" in this policy).

In case of a firm, if found to have taken part in corruption, the firm could face an unlimited fine by the prevailing laws and or be excluded from tendering. 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, advisors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

**Definitions**

**Corruption:** According to Transparency International, corruption is defined as abuse of entrusted power for self-gain

**Bribery:** A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

**Gift:** A thing given [willingly](#) to someone without payment; a present. *Gift means:* any item that has a physical form, offered to a staff member. The term includes minor gifts of essentially nominal value. UN Secretariat 14 January 2010.

**Hospitality:** This extends to anyone providing pieces of an event that provides a friendly, welcoming environment that defines hospitality. **The friendly and generous reception and entertainment of guests, visitors, or strangers.** Some examples of individual hospitality include **inviting someone in your home for a drink or a meal**, making sure your visitors are comfortable, giving gifts, expressing regard, and offering help or guidance. And when hospitality is monetized, it's called the hospitality industry.

**Facilitation payment:** It is the term often given to an illegal or unofficial payment made in return for services which the payer is legally entitled to receive without making such payment. It is normally a relatively minor payment made to a public official or person with a certifying function in order to secure or expedite the performance of a routine or necessary action, such as the issue of a visa, work permit or customs clearance.

**Kickbacks:** Where an employee improperly receives a share of funds or a commission from a supplier because of their involvement in a corrupt bid or tender process. (Save the children).

**Donations:** Money or goods given to help a person or a organisation (Cambridge Dictionary)

### **GIFTS AND HOSPITALITY**

- This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.
- The giving or receipt of gifts is not prohibited, if the following requirements are met:
  - 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 exchange for favours or benefits;
  - it complies with the laws;
  - it is given/received in our name, not in your name;
  - it does not include cash or a cash equivalent (such as gift certificates or vouchers);
  - it is appropriate in the circumstances for small gifts to be given at Christmas time, taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
  - 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 all KULIKA Managements.
- We appreciate that the practice of giving business gifts varies between 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.

### **WHAT IS NOT ACCEPTABLE?**

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;
- 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.

### **FACILITATION PAYMENTS AND KICKBACKS**

- We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.
- If you are asked to make a payment on organisational 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. If you have any suspicions, concerns or queries regarding a payment, you should raise these with KULIKA Management.
- Kickbacks are typically payments made in return for a business favour or advantage. 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.

### **DONATIONS**

- No donation must be offered or made without the prior approval of the KULIKA Management.

### **YOUR RESPONSIBILITIES**

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

- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- You must notify KULIKA Management as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a business partner offers you something to gain a business advantage with KULIKA or indicates to you that a gift or payment is required to secure business.
- Any worker who breaches this policy will face disciplinary action. We reserve our right to terminate our contractual relationship with other workers such as subcontractors if they breach this policy.

#### **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.

#### **HOW TO RAISE A CONCERN**

- You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. These should be raised with KULIKA Management.

#### **WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY OR CORRUPTION**

- It is important that you tell KULIKA Management 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.

#### **PROTECTION**

- 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 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, you should inform KULIKA Management immediately.

#### **TRAINING AND COMMUNICATION**

- All staff and workers will receive a copy of this policy.
- Our zero-tolerance approach to corruption and bribery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

#### **WHO IS RESPONSIBLE FOR THE POLICY?**

- The Executive Director has overall responsibility for ensuring this policy complies with our legal and ethical obligations and internal policies.
- Management at all levels are responsible for ensuring those reporting to them is made aware of and understand this policy and are given adequate and regular training on it.

**MONITORING AND REVIEW**

- The KULIKA Management 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 staff/ workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

**POLICY REVIEW**

We are committed to reviewing our policy and good practice annually.

Improvements to this policy will be through submission of comments, suggestions, and queries to the KULIKA Management.

Head of Finance, Human Resource & Administration

Name.....signed.....Date.....

Executive Director:

Name.....Signed..... Date.....

I.....(Name) the undersigned have read, understood and commit to adhere with the Anti-Corruption and Bribery Policy of Kulika in the course of executing the terms of agreement/contract as a Kulika employee or affiliate.

Signed.....Date.....