Anti-Fraud, Anti-Corruption & Anti-Bribery Policy

BUENE HOPE FOUNDATION LTD

Organisation: BUENE HOPE FOUNDATION LTD (ABN 90 692 932 139)

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1. Purpose

This policy prevents, detects, and responds to fraud, corruption, bribery, theft, diversion and financial misconduct. It applies to all operations, especially in high-risk contexts such as the DRC.

2. Zero-Tolerance Statement

BUENE HOPE prohibits all forms of fraud, bribery, corruption, kickbacks, extortion, facilitation payments, and misuse of assets.

3. Common Risk Areas

- Procurement and supplier selection.
- Cash handling and distributions.
- Recruitment and payroll.
- Beneficiary registration and distribution lists.
- Transport and logistics.

4. Controls & Safeguards

- Two-person approval for all spending above $500.
- Segregation of duties (request ≠ approve ≠ pay).
- Market checks/quotes for procurement.
- No cash or gift acceptance from suppliers or beneficiaries.
- Mandatory sanctions screening for suppliers.
- Regular reconciliations and surprise checks.

5. Reporting Channels

- Reports can be made to the Manager, Financial Manager, or Board.
- Anonymous reporting is allowed.
- Retaliation against whistleblowers is prohibited.

6. Investigation Procedures

- The Manager oversees initial fact-finding.
- Financial Manager secures financial evidence.
- Serious cases are elevated to the Board for full investigation.

- Corrective actions may include suspension, recovery of funds, or reporting to authorities.

7. Consequences

Confirmed misconduct may lead to termination and referral to law enforcement.