



**SUSTAINABLE AGRICULTURE TANZANIA**  
SOLUTIONS FOR A BETTER FUTURE

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

## Sustainable Agriculture Tanzania (SAT)

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## 1. Introduction

- 1.1 This anti-bribery, anti-corruption, anti-fraud and whistleblowing policy exists to set out the responsibilities of SAT and those who work for us in regard to observing and upholding our zero-tolerance position on bribery and corruption.
- 1.2 It also exists to act as a source of information and guidance for those working with and for SAT. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Policy statement

2.1 SAT is committed to conducting business in an **ethical** and **honest** manner and is committed to implementing and enforcing systems that ensure bribery, corruption and fraud is prevented. SAT has zero-tolerance for bribery, corrupt and fraud activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

2.2 SAT will constantly uphold all laws relating to anti-bribery, anti-corruption and anti-fraud in all the jurisdictions in which we operate. We are bound by the laws of the United Republic of Tanzania, including the Prevention and Combating of Corruption Act No. 11 of 2007 in regard to our conduct both in the country and abroad.

2.3 SAT recognises that bribery, corruption and fraud are criminal offenses punishable by law with imprisonment term and/or a fine. Committing any of these offenses results into immediate termination of employment. SAT is an organization with good standing and reputation, we practice due diligence and commit ourselves to preventing bribery, corruption and fraud in our operations and take our legal responsibilities seriously.

## 3. Policy scope of coverage

3.1 This policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our partners or their employees, no matter where they are located (within or outside of the United Republic of Tanzania). The policy also applies to Officers, Board Members, and/or Committee members at any level.

3.2 In the context of this policy, third-party refers to any individual or organisation our organization meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

3.3 Any arrangements our organization makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum

## 4. Definition of bribery, Corruption and Fraud

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

4.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe anyone anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the organization's Chief Executive Officers.

4.5 Corruption is dishonest or fraudulent conduct by those in power, typically involving bribery. dishonesty, dishonest dealings, unscrupulousness, deceit, deception, duplicity, double-dealing, fraud, fraudulence, misconduct, lawbreaking, crime, criminality, delinquency, wrongdoing and subornation.

4.6 Fraud is the process by which a word or expression is changed from its original state to one regarded as erroneous or debased. It involves alteration, falsification, manipulation, manipulating, fudging, adulteration, debasement, degradation, abuse, subversion, misrepresentation and misapplication.

**4.7 All the above are criminal offenses punishable by law and result to immediate termination of employment at SAT.**

## 5. What is and what is NOT acceptable

5.1 This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

### 5.2 Gifts and hospitality

SAT accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- b. It is not made with the suggestion that a return favour is expected.
- c. It is in compliance with local law.
- d. It is given in the name of the organization, not in an individual's name.
- e. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to the organization for helping with a large project upon completion).
- g. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- h. It is given/received openly, not secretly.
- i. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- j. It is not above a value of TZS 100,000/=.
- k. It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the organization Chief Executive Officers.

5.3. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Chief Executive Officers, who will assess the circumstances.

5.4 SAT recognises that the practice of giving and receiving gifts varies between villages, regions, countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

5.5 As good practice, gifts given and received should always be disclosed to the Chief Executive Officers. Gifts from suppliers should always be disclosed.

5.6 The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Chief Executive Officers should be sought.

5.7 Facilitation Payments and Kickbacks. SAT does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

#### 5.8 Political Contributions

SAT will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

#### 5.9 Charitable Contributions

SAT accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

5.10 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

5.11 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the Chief Executive Officers.

## 6. Employee Responsibilities

**6.1 As an employee of SAT, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.**

6.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Chief Executive Officers.

6.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct.

**6.5 SAT has the right to terminate a contractual relationship with an employee, intern, volunteer, vendor, consultant, vendor or partner if they breach this anti-bribery policy.**

## **7. Whistleblowing procedure**

This section of the policy covers 3 areas:

- a) How to raise a concern.
- b) What to do if you are a victim of bribery or corruption.
- c) Protection.

### **7.1 How to raise a concern**

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to SAT, you are encouraged to raise your concerns at as early a stage as possible. As soon as the concern is received, immediately the committee will investigate and needed action will be taken. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, you should speak to the Chief Executive Officer or the designated committee.

SAT will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

### **7.2 What to do if you are a victim of bribery or corruption**

You must tell the Chief Executive Officer as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt or fraudulent activity.

### **7.3 Protection**

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery, corruption or fraud, SAT understands that you may feel worried about potential repercussions. Confidentiality is assured and SAT will support anyone who raises concerns in good faith under this policy, even if investigation finds that they were mistaken.

7.4 SAT will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

7.5 Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to the concern the individual raised.

7.6 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform the Chief Executive Officers immediately.

## **8. Training and communication**

8.1 SAT will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked at every contract renewal to formally accept that they will comply with this policy. Part of the clauses from this policy will be included in the employment contract as well as contracts of any vendors, contractors, consultants and any persons working for or with SAT.

8.2 SAT's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

8.3 SAT will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

## 9. Record keeping

9.1 SAT will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to managerial review.

## 10. Monitoring and reviewing

10.1 SAT's Chief Executive Officer is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

10.3 Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the Chief Executive Officer.

10.4 This policy does not form part of an employee's contract of employment and SAT may amend it at any time so to improve its effectiveness at combatting bribery, corruption and fraud.

## 11. Resources to report Bribery, Corruption or Fraud

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