



# BOOKFEEDING PROJECT



**Anti-Money Laundering, Anti-Bribery  
and Anti-Corruption Policy**

## **1. Purpose**

The purpose of this Policy is to ensure that all incidences of fraud, money laundering, bribery, corruption and any other financial crimes are identified and addressed in an appropriate and timely manner by Bookfeeding Project.

## **2. Scope**

This Policy applies to the Bookfeeding Project trustees, volunteers, donors, beneficiaries, and any partners that provide support, services, or donations, to Bookfeeding or promote its work at any location throughout the world.

## **3. Introduction**

The Bookfeeding Project is committed to acting professionally and fairly in all of its dealings and relationships, employing the highest standards of openness, transparency, honesty and accountability and takes a zero-tolerance approach to any fraud, bribery, money laundering and corruption.

The Bookfeeding Project promotes a culture of honesty and integrity, and opposes any form of fraud, bribery, money laundering or corruption.

Fraud, bribery, money laundering, and corruption impact disproportionately on the poor and the most vulnerable people in the world.

Such criminal activities divert resources intended for humanitarian assistance and development away from our intended beneficiaries; they increase the costs of basic public services; and undermine economic growth. Such actions are a barrier to poverty alleviation, the promotion of education and good governance.

The purpose of the Bookfeeding Project Anti-Fraud and Anti-Corruption Policy is to provide clear definitions of what we mean by fraud, bribery, money laundering and corruption. It is also a definitive statement to everyone associated with the Bookfeeding Project - making clear that we will not tolerate fraudulent activities, corrupt activities, and the giving or receiving of bribes.

This policy summarises the responsibilities of all Bookfeeding Project trustees, Board members, volunteers, donors, beneficiaries, and any partners that provide support, services, or donations to the Bookfeeding Project.

The Bookfeeding Projects trustees and board are committed to the implementation of this policy at all times and in all situations, they might find themselves in.

#### **4. Definitions**

##### **What is Fraud?**

Fraud is used to describe a range of illegal activities. These include, but are not limited to, deception, forgery, theft, the false reporting or concealment of material facts, collusion, and corruption (Including bribery) and undeclared conflicts of interest.

Examples of fraud other than bribery, include, but are not limited to:

- Theft of money, property, or assets
- Inappropriate use of company assets
- Submitting false expense claims
- Forging, tampering with, or falsely creating documents or records
- Destroying or removing documents or records
- Knowingly creating or distributing false financial information or reports
- Engaging in bribery or corruption
- Deliberately ignoring or acquiescing in fraudulent activity

##### **What is Bribery and Corruption?**

The following are definitions of the above concepts (in law they have varying definitions and meanings);

**Bribery:** The offering, promising, giving, accepting, or soliciting of money, gifts or other advantages in exchange for doing something illegal or breaching an employer's trust.

**Corruption:** The abuse of entrusted power or influence for private gain.

**Money Laundering:** Money laundering is the illegal process of making large amounts of money generated by a criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source. The money from the criminal activity is considered dirty, and the process "launders" it to make it look clean.

**Facilitation Payments and Kickbacks:** All Bookfeeding Project trustees and board members must avoid any activity that might lead to a facilitation payment being made or accepted by or on behalf of Bookfeeding Project. Bookfeeding Project prohibits the making or accepting of facilitation payments and 'kickbacks'.

If someone suspects a payment request to be solely for the purposes of facilitation, they should ask that a detailed receipt be provided. If there appears to be no legitimate reason for a request for payment, it should be explained that Bookfeeding Project does not make or accept facilitation payments.

### Payments Under Duress

Payments under Duress It is permissible for a payment to be made in the rare and exceptional circumstances where it is believed necessary to protect against loss of life, limb or liberty (except in the case of lawful detention).

If possible, the circumstances and proposed payment should be discussed in advance with a line manager. In all such cases an incident report must be submitted.

### Gifts and Hospitality

The giving or receiving of gifts (other than those deemed to be small promotional items) by or on behalf of Bookfeeding Project is not permitted under any circumstances. Bookfeeding Project trustees and Board members must exercise great caution when offering or accepting hospitality and entertainment.

They must be certain that what is being offered is not designed to gain improper benefit or does not otherwise amount to bribery or corruption.

The providing or accepting of hospitality or entertainment is allowed, if:

- It is not done with the intention of influencing the behaviour of the recipient;
- It is done openly;
- It complies with local law.

If a member of Bookfeeding Project trustees or Board wishes to offer entertainment or hospitality, it must be authorised by the rest of the board members in advance.

### All Bookfeeding Project trustees, board members and volunteers

It is the responsibility of every Bookfeeding Project trustees, volunteers, and board members to carry out their work and conduct themselves at all times in such a way as to prevent fraud, bribery and corruption.

All Bookfeeding Project trustees and Board members must be alert to and report any actual or suspected instances of fraud, money laundering, bribery and/or corruption.

### Communication

As part of the induction given to new trustees, volunteers, and Board members, Bookfeeding Project will effectively communicate this policy to all parties involved with any Bookfeeding activities.