

**STRATEGIC TRADE  
RESEARCH INSTITUTE**

**ANTI-FRAUD  
AND  
ANTI-BRIBERY POLICY**

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## 1 Scope of this Policy

- 1.1 This policy applies to all relevant persons of STRI. Relevant persons include staff, board members, volunteers, and short-term contractors.
- 1.2 Part I includes sections that are useful for and made available to all relevant persons and are publicly available on STRI's website.
- 1.3 Part II includes sections that are used for the board in responding to allegations and incidences of fraud and building an anti-fraud culture.

## 2 Zero Tolerance on Fraud or Bribery

2.1 STRI's position on fraud and bribery is to take a zero-tolerance approach, and we are committed to pursuing this approach throughout operational practices for the following reasons:

- STRI recognizes the significant risk that fraud and bribery pose to achieving its aims and objectives. Any money that is lost to fraud or bribery is money that cannot be used to accomplish our mission.
- Corrupt behaviour also seriously damages our reputation. The eradication of fraud and bribery in the way we operate is greatly important to securing our stakeholders' trust and confidence.
- We owe it to our communities to condone fraud or bribery. Corruption creates unstable societies. It destroys public and business standards and forces ordinary people to use ill-advised resources in their interactions with the government and other public bodies.

2.2 We support the application of the zero-tolerance policy by providing:

- **Direction** and rules to establish appropriate and expected behaviour.
- Effective **deterrents** to inappropriate behaviour in the form of meaningful consequences.
- **Prevention** measures to reduce the risk of fraud or bribery occurring.
- **Detection** measures to identify fraud or bribery if it happens, including whistleblower lines.
- **Response** measures to ensure we react well to suspicions, allegations, and proven incidents of fraud and bribery, including protection and fair treatment for the accusers and accused.
- **Measurement** processes to evaluate the impact and success of our anti-fraud and bribery policy and management of risk.

- Deliberate proactive steps to embed anti-fraud & bribery thinking into our **culture**, including staff training and awareness.

2.3 Anyone found guilty of fraud or bribery will be subject to disciplinary measures, which ordinarily include dismissal, prosecution, and recovery of losses.

### 3 Anti-Bribery Policy

3.1 STRI employs all legal and safe tactics to avoid and resist paying bribes to public officials, even if it results in denials, delays, inconvenience, and increased cost to our operations.

3.2 No person is authorized to pay a bribe on behalf of STRI or use STRI funds.

3.3 Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

### 4 Conflicts of Interest

4.1 A conflict of interest exists where an employee or a board member has an interest, relationship, or friendship which could, or could be seen to, interfere with their ability to decide an issue in the best interests of STRI.

4.2 The purpose of this policy is to ensure that all conflicts of interest are **declared**, declared conflicts are **managed** to mitigate the associated risks, and that decisions and actions are **documented** to ensure transparency and accountability.

4.3 Examples of conflicts of interest include (but are not limited to):

- Relationships between members of the Senior Leadership Team, accounts staff, procurement staff, HR staff or board members, and any other staff member.
- Relationships between any person and their line manager
- Relationships between STRI staff or board members and suppliers, donors, grantees, beneficiaries, or job applicants.
- A 'relationship' in this context could include family, romantic relationships, being a bank signatory, advisor, or board member.

4.4 The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed promptly.

- 4.5 All staff (including those listed above) are required to disclose conflicts of interest as soon as they arise, or the staff member becomes aware of the conflict of interest.
- 4.6 The recruitment conflict of interest declaration form should be signed by all relevant persons involved in the development or design of selection tools, those with access to the selection tools, and those involved in the selection process. It should be signed as soon as all the applications are received and before any short listing.
- 4.7 In the case of tenders and procurements, the STRI Board should convene a meeting and the meeting agenda should always include a clear listing of all suppliers on the approved suppliers list, and all who have provided quotes for the purchases under consideration. All members present should be required to declare that they have no interests in any of the suppliers under consideration at that meeting, and this should be recorded in the minutes.
- 4.8 If a conflict arises or is discovered, it should be immediately declared.
- 4.9 Appropriate actions should be taken to resolve the conflict of interest, which may be temporary or permanent, for example:
- A tender and procurement committee member is removed from a particular supplier selection decision in which they are conflicted.
  - A staff member ceases to act as a board member, signatory, or advisor which is causing the conflict.
  - A conflicted staff member is removed from all aspects of the recruitment and selection process.
  - One person in a romantic relationship within STRI leaves.
- 4.10 The steps taken to manage the conflict of interest and mitigate the risk of conflicted decision taking should be documented on the declaration form.

## 5 Gifts and Entertainment

- 5.1 Gifts and entertainment should never be used or allowed to influence business decision-making.
- 5.2 When offers of gifts and entertainment are made or accepted in situations where they are inappropriate, they can look like, or may be, bribes. They can expose us to accusations of unfairness or even break the law and can put our reputation for ethical behaviour at risk.

5.3 The following gifts may never be offered or accepted and will always be deemed inappropriate.

- Cash of any amount
- Gifts and entertainment
- Any gifts or loans from existing suppliers or prospective suppliers while a tender process is underway
- Any gifts or loans to staff involved in supplier selection decisions (e.g., procurement officer or member of the tender and procurement committee).
- Entertainment involving gambling, anything of a sexual nature, or exploitation of others.

5.4 It is never allowed to request a gift or entertainment.

5.5 In the event that a gift was received without consent (such as courier deliveries, bank, or mobile money transfers), these should be declared immediately. Steps should be taken to return the gift or notify authorities if money laundering is suspected.

## 6 Speaking Up

6.1 STRI's policy on speaking up is documented in the STRI Whistleblowing Policy document and is designed to build confidence to report genuine concerns about fraud, bribery, or other types of misconduct.

## 7 Reporting Process

7.1 Details of any allegations or suspicions raised should be recorded on a Fraud, Bribery, and Misconduct report form and submitted to the Director.