

STATUTORY BODIES FAMILY PROTECTION FUND (SBFPF)

Anti-Corruption Policy



SBFPF

Vision

- *We desire to place our organisation on the same footing as other institutions in the financial sector offering invaluable services to the whole community of pensioners and affiliated members and diversifying our activities.*
- *We shall endeavour to concentrate much of our efforts on innovative actions, teamwork, initiative, efficiency and competitiveness.*

Mission

- *We are an organisation which caters mainly for the pension needs of beneficiaries of deceased employees from all Municipalities, District Councils and other member Statutory Bodies.*
- *We manage funds in the best possible manner to achieve a superior financial return balanced with our long-term growth, benefiting primarily our pensioners, associates and employees.*
- *We have a dedicated staff who have a sense of commitment for the welfare and improvement of our pensioners and members.*
- *We endeavour to provide an excellent level of service to the community of members and beneficiaries backed by up to date information technology and professional support*

Core Values

- *Customer Care: To offer best services to our pensioners, associates and members of the public*
 - *Innovative: Tailoring services to meet changing customer needs, to improve efficiency and competitiveness*
 - *Integrity: Application of Good Governance and honesty in our day to day activities*
 - *Teamwork: To provide service with enthusiasm and speed*
 - *Dynamism: To provide continuous training and staff motivation to keep pace with development trend and to meet daily challenges*
 - *Diversity: To provide equal opportunity to all*
 - *Sustainability: To improve the financial base of the Organization and to promote its growth*
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SBFPPF-Anti-Corruption Policy

1.0 Introduction

SBFPPF recognises that the risk of corruption is present and may occur in the organisation. It is committed to maintain the highest level of integrity in the conduct of its affairs through the adoption of corruption prevention strategies in the SBFPPF.

This Anti-Corruption Policy sets out the full commitment of the SBFPPF for the deterrence and detection of corruption and for adherence to a culture of integrity.

2.0 Statement of Intent

SBFPPF will not tolerate corruption in the administration of its responsibilities, whether from inside or outside. It expects the highest standards of conduct from staff, board members, management and employees and those who have dealings with the organisation including stakeholders and the general public. It is committed to ensuring that the risks of corruption and the potential losses that might result are minimized.

3.0 Policy Statement

SBFPPF is committed to promoting and adhering to the highest standards of probity, transparency and accountability in the operations and management of the organisation. Through this policy the organisation engages itself to fully and unequivocally adopt a zero-tolerance stance towards corruption and other malpractices and shall ensure compliance with the anti-corruption legislation.

4.0 Anti-Corruption Commitment

SBFPF has signed the Anti-Corruption commitment developed by the ICAC and has thus committed itself to use all available means and resources at its disposal to combat corruption in all its forms at all times including the application of appropriate prevention and detection control measures.

For the purpose of ensuring sound implementation of this policy, SBFPF will ensure that:

- Employees have sufficient knowledge concerning the Anti-Corruption Policy and that it is applied to all undertakings.
- Adequate controls to counteract corruption are known and used within the Organisation.
- There are clear procedures and systems for handling suspected cases of corruption.
- All our stakeholders are aware of the SBFPF's Anti-Corruption Policy.

The main objective of the SBFPF's Anti-Corruption Policy is to strengthen and sustain an integrity culture within the organisation. This will be achieved through:

- The setting-up of effective processes characterized by broad participation and transparency.
- Regular evaluation of corruption risks, systems and procedures.
- Ensuring that projects have clearly formulated goals, expected results as well as monitoring and follow-ups.
- Learning from experiences and continuously improving organizational performance and the corporate image.

5.0 Scope and Applicability

This policy covers measures and practices of SBFPF on preventing and combating corrupt, fraudulent, collusive or coercive practices in its activities and operations. This policy applies to board members, management, employees as well as, consultants, suppliers, contractors,

outside agencies doing business, and or any other parties having a business relationship with the organization.

6.0 Definitions

For the purpose of this policy, corruption is defined as per section 2 of the Prevention of Corruption Act, 2002 as amended.

"act of corruption" -

- (a) means an act which constitutes a corruption offence; and
- (b) includes -
 - (i) any conduct whereby, in return for a gratification, a person does or neglects from doing an act in contravention of his public duties;
 - (ii) the offer, promise, soliciting or receipt of a gratification as an inducement or reward to a person to do or not to do any act, with a corrupt intention;
 - (iii) the abuse of a public or private office for private gain;
 - (iv) an agreement between 2 or more persons to act or refrain from acting in violation of a person's duties in the private or public sector for profit or gain;
 - (v) any conduct whereby a person accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification for inducing a public official, by corrupt or illegal means, or by the exercise of personal influence, to do or abstain from doing an act in the exercise of his duties to show favour or disfavour to any person.

All the sections of the law penalising corruption offences are described in sections 4 to 17 (A) of the Prevention of Corruption Act 2002 as amended. These include among others, bribery by public official, bribery of public official, taking gratification to screen an offender from

punishment, public official using his office for gratification, *traffic d'influence* and conflict of interests.

7.0 Declaration of Assets

Relevant staff has the responsibility to comply with the Declaration of Assets Act 2018, as amended, and submit their declaration of assets forms within the prescribed time frame.

8.0 Responsibilities for Implementing the Policy

The responsibility to develop and coordinate the implementation of the policy shall rest upon the Anti-Corruption Committee (ACC) established for the purpose. The ACC shall set priorities, provide advice when ethical issues arise and communicate the policy to all levels of management and staff.

The Anti-Corruption Committee - The committee shall comprise of members from both operational and support departments of the institution.

The person identified by SBFPF shall lead the project and chair all meetings. The ACC shall be responsible for coordinating and implementing the Anti-Corruption Policy. It shall develop a time-bound programme with clear and precise deliverables and related budget and execute it once approved by top management. The organisation shall designate an officer to act as Secretary to the committee.

The committee shall meet on a regular basis, preferably every two or as decided by the Chairperson of the ACC. The Chair shall decide upon the setting up of sub-committees to assist the ACC in the implementation of any initiatives decided by the ACC.

Role of Management -It is the responsibility of Management to promote the Anti-Corruption Policy within their areas of operation. Head of departments are expected to

actively deter, prevent and detect corruption by maintaining effective control systems and ensuring that their staff is familiar with the policy.

Role of Employees –Each employee shall read, be familiar with and strictly comply with the policy. The organisation shall ensure that each employee is provided with a copy of this policy or otherwise has on-line access.

Role of Internal Audit – The Internal Audit has the responsibility to ensure the effectiveness and adequacy of the Internal Control System in place. It should ensure that the system is subject to regular audit to provide assurance that they are effective in countering corruption opportunities.

9.0 Risk Assessment

SBFPF is conscious that the risk of corruption may occur in every sphere of its activities and may evolve in the light of changing circumstances and working environment. In its endeavour to proactively address risks of corruption, the SBFPF shall ensure that a proper risk management process is in place. Risk assessment should focus on a thorough analysis of the functional activities in close collaboration with officers involved in the process with a view to identifying potential or actual corruption risk areas. With respect to risks identified necessary corruption prevention measures including policies and procedures should be developed to address the risks. The responsibility to plan, coordinate and monitor the risk management process rests with the ACC.

10.0 Handling and Reporting Corruption

Reporting suspected cases of corruption- Notwithstanding Section 44(1) of the Prevention of Corruption Act 2002 as amended which provides that where an officer of a public body suspects that an act of corruption has been committed within or in relation to that public body, he shall forthwith make a written report to the Independent Commission

Against Corruption, the Organisation shall put in place measures that shall facilitate the reporting of suspected cases.

S 45 of the PoCA 2002 as amended provides that where in the exercise of his functions, the chief executive of a public body is of the opinion that an act of corruption may have occurred, he may refer to the Independent Commission Against Corruption for investigation.

SBFPF may set up a committee to assist the Officer in Charge of the organisation in determining whether there is reasonable doubt for suspicion of corruption prior to referral of the case to the Independent Commission Against Corruption for investigation.

Confidentiality -Information pertaining to complaints shall not be disclosed to any unauthorised party.

11.0 Protection of whistleblowers

There will be no reprisal by management against “the public official” who in good faith reports an act of corruption or malpractice or suspected illegal and dishonest activity or any activity that he/she has witnessed. However, disciplinary actions may be taken against any person who knowingly had made false allegations.

12.0 Disciplinary measures

SBFPF is committed to ensuring that this policy is duly implemented in the organisation.

Disciplinary measures in accordance with established procedures will be taken against any staff who is found guilty of a breach of the provisions contained in this policy.

13.0 Training and Communications

SBFPF recognises that the success and credibility of this policy depends on effective training, communications and the awareness of directors and employees throughout the organisation. Management should ensure that the Anti-Corruption Policy is clearly disseminated to all staff and that its contents are understood.

14.0 Review of policy

This policy will be reviewed annually or earlier if necessary or in the event of any changes in the laws and regulations that are relevant to the organisation. The Chairperson of the ACC should recommend the review to the Board/Officer in charge as applicable.

15.0 Approval

SIGNATURES

Chairperson of Board: **Date:**

Officer in Charge: **Date:**

*Prepared by: A.S. Joomrattun
Internal Audit Service*

Vetted by: Anti-Corruption Committee

Date:

Vetted by: ICAC

Date:



SBFPF
ANTI-CORRUPTION POLICY

ICAC