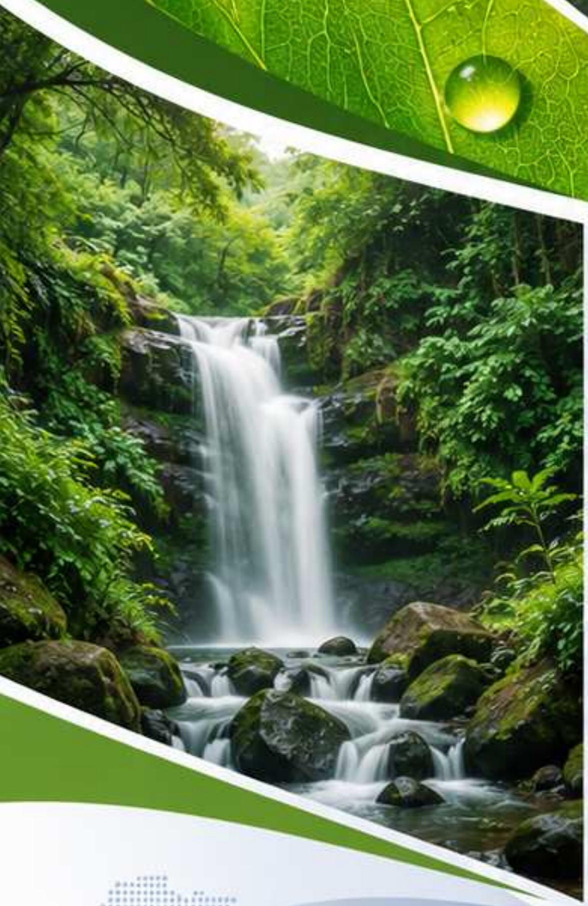
Anti-Corruption and Fraud Prevention Policy



ACEECA

African Centre For Environment, Energy, and Climate Advocacy

CONTENT

1.0 POLICY INFORMATION

Item	Description
Policy Title	Anti-Corruption and Fraud Prevention Policy
Organization	African Centre for Environment, Energy, and Climate Advocacy (ACEECA)
Policy Category	Governance and Accountability Policy
Approval Authority	Board of Directors
Responsible Office	Office of the Chief Executive Officer and Finance & Administration Department
Effective Date	Upon Board Approval
Review Cycle	Every Three Years or Earlier if Required
Applies To	Board Members, Directors, Employees, Volunteers, Consultants, Interns, Contractors, Vendors, Partners, and Beneficiaries

2.0 PREAMBLE

The ***African Centre for Environment, Energy, and Climate Advocacy (ACEECA)*** is founded on the principles of integrity, transparency, accountability, fairness, and responsible stewardship of resources entrusted to the organization. As a mission-driven institution working to advance environmental protection, climate action, clean energy, and policy advocacy across Kenya and Africa, ACEECA recognizes that public trust is one of its most valuable assets.

ACEECA receives and manages financial and non-financial resources from donors, development partners, governments, corporations, and communities. These resources are intended exclusively for advancing the organization's mission and achieving measurable social and environmental impact. Any act of corruption, fraud, bribery, embezzlement, collusion, or other financial misconduct undermines the organization's credibility, damages stakeholder confidence, diverts resources from vulnerable communities, and compromises the achievement of development objectives.

This Policy establishes a comprehensive framework for preventing, detecting, reporting, investigating, and responding to corruption and fraud in all areas of ACEECA's operations. It reflects internationally recognized best practices and is aligned with standards promoted by organizations such as the United Nations, World Bank, Organisation for Economic Co-operation and Development, and Transparency International.

ACEECA adopts a strict zero-tolerance approach to corruption and fraud. Any individual associated with the organization who engages in prohibited conduct, or who knowingly fails to report such conduct, will be subject to disciplinary action, termination of engagement, restitution, and referral to law enforcement and regulatory authorities where appropriate.

3.0 POLICY STATEMENT

African Centre for Environment, Energy, and Climate Advocacy (ACEECA) is committed to conducting all its activities with the highest standards of honesty, ethical conduct, and institutional integrity. The organization maintains a zero-tolerance approach to corruption, fraud, bribery, theft, embezzlement, collusion, abuse of office, and any other form of financial or ethical misconduct.

No person associated with ACEECA, regardless of position or contractual status, may directly or indirectly engage in any conduct intended to obtain an improper advantage, misuse organizational resources, distort decision-making processes, or compromise the interests of the organization and its stakeholders.

ACEECA further commits to establishing and maintaining robust systems of internal control, financial oversight, ethical leadership, and transparent reporting to prevent misconduct and to ensure that all allegations are addressed promptly, fairly, confidentially, and without retaliation.

The organization expects all individuals and entities with whom it works to uphold equivalent standards of integrity and to actively support the prevention and reporting of misconduct.

4.0 PURPOSE OF THE POLICY

The purpose of this Policy is to provide a comprehensive institutional framework to prevent, detect, report, investigate, and address corruption and fraud in all aspects of ACEECA's operations.

Specifically, this Policy seeks to:

1. Protect financial, material, intellectual, and reputational assets entrusted to ACEECA.
2. Promote a culture of honesty, accountability, and ethical leadership.
3. Establish clear definitions of prohibited conduct.
4. Set out responsibilities for prevention and reporting.
5. Provide safe and confidential mechanisms for disclosure.
6. Ensure prompt and impartial investigations.
7. Prescribe appropriate disciplinary, contractual, and legal consequences.
8. Strengthen donor confidence and public trust.
9. Ensure compliance with applicable laws, regulations, and donor requirements.
10. Safeguard resources intended for communities and environmental programmes.

5.0 SCOPE OF APPLICATION

This Policy applies to all activities, programmes, projects, partnerships, and transactions undertaken by ACEECA in every location where the organization operates.

The Policy is binding upon all individuals and entities acting on behalf of ACEECA, including members of the Board of Directors, directors, employees, volunteers, interns, consultants, researchers, field officers, project staff, temporary workers, and contractors. It also applies to suppliers, service providers, grant recipients, implementing partners, consortium members, and any third party receiving or managing ACEECA resources.

Compliance with this Policy is a condition of employment, appointment, partnership, procurement, and funding. Contracts and agreements may include specific anti-corruption clauses requiring adherence to this Policy.

6.0 GUIDING PRINCIPLES

6.1 Integrity

All decisions and actions shall be guided by honesty, fairness, and consistency with ACEECA's values.

6.2 Accountability

Every person entrusted with authority or resources shall be answerable for their actions and decisions.

6.3 Transparency

Financial and operational processes shall be conducted openly and documented accurately.

6.4 Zero Tolerance

Any substantiated act of corruption or fraud shall result in decisive corrective action.

6.5 Due Process

All allegations shall be investigated objectively, fairly, and confidentially.

6.6 Protection from Retaliation

Individuals who report concerns in good faith shall be protected against retaliation.

6.7 Stewardship

Resources entrusted to ACEECA shall be used solely for legitimate organizational purposes and for the benefit of communities and ecosystems the organization serves.

7.0 DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings set out below. These definitions are intended to provide clarity and ensure a common understanding across all operations of Africa Centre for Environment, Energy, and Climate Advocacy (ACEECA).

7.1 Corruption

Corruption refers to the abuse of entrusted power, authority, position, or influence for private gain or for the benefit of another person or entity. Corruption may occur in financial, administrative, operational, or programmatic activities and may involve direct or indirect actions intended to secure an improper advantage.

Corruption includes, but is not limited to, bribery, kickbacks, extortion, nepotism, favoritism, abuse of discretion, and manipulation of procurement or recruitment processes.

7.2 Fraud

Fraud is any intentional act or omission designed to deceive another person or institution in order to obtain money, property, services, information, or any other benefit unlawfully or improperly. Fraud requires deliberate misrepresentation or concealment of material facts.

Examples include falsification of financial records, forged receipts, inflated invoices, fictitious suppliers, false expense claims, and misrepresentation of programme results.

7.3 Bribery

Bribery is the offering, giving, soliciting, or receiving of money, gifts, hospitality, favors, employment opportunities, or anything of value to influence a decision, action, or omission improperly.

Bribery may involve public officials, private entities, suppliers, community leaders, or any other stakeholder.

7.4 Kickback

A kickback is a form of bribery in which a portion of a contract payment or financial benefit is returned to a decision-maker in exchange for awarding business, approving payments, or providing favorable treatment.

7.5 Embezzlement

Embezzlement is the dishonest appropriation or conversion of funds, assets, or property entrusted to an individual for personal use or unauthorized purposes.

7.6 Theft

Theft is the unauthorized taking or use of money, equipment, supplies, intellectual property, or any other assets belonging to ACEECA or its partners.

7.7 Misappropriation

Misappropriation refers to the use of funds, property, or resources for purposes other than those for which they were intended or authorized.

7.8 Collusion

Collusion is a secret agreement between two or more parties to deceive, manipulate, or defraud ACEECA or another stakeholder, often in procurement, contracting, or grant administration.

7.9 Conflict of Interest

A conflict of interest arises when an individual's personal, financial, professional, or family interests interfere, or appear to interfere, with their duty to act in the best interests of ACEECA.

7.10 Nepotism

Nepotism is the granting of employment, contracts, promotions, or other benefits to relatives or close associates without merit-based justification and without proper disclosure.

7.11 Favoritism

Favoritism is the unfair preference given to a particular individual or entity for personal reasons rather than objective and transparent criteria.

7.12 Extortion

Extortion is obtaining money, property, services, or other benefits through coercion, threats, intimidation, or abuse of authority.

7.13 Facilitation Payment

A facilitation payment is a small unofficial payment made to expedite routine government or administrative actions. ACEECA prohibits such payments except where an immediate threat to health or safety leaves no reasonable alternative, in which case the incident must be reported promptly.

7.14 Money Laundering

Money laundering involves concealing the origin of illegally obtained funds through financial transactions intended to make such funds appear legitimate.

7.15 Retaliation

Retaliation means any adverse action taken against a person because they reported suspected misconduct, participated in an investigation, or refused to engage in prohibited conduct.

7.16 Whistleblower

A whistleblower is any person who, in good faith, reports suspected corruption, fraud, or other misconduct to ACEECA or to an authorized external authority.

7.17 Good Faith

Good faith means a genuine and reasonable belief that the information reported is true, regardless of whether the allegation is ultimately substantiated.

7.18 Asset

An asset includes cash, bank balances, equipment, vehicles, documents, digital systems, intellectual property, inventories, and any other resources owned, leased, or controlled by ACEECA.

7.19 Public Official

A public official includes any government employee, elected representative, regulatory officer, customs official, law enforcement officer, or person acting in an official public capacity.

7.20 Red Flag

A red flag is any indicator, anomaly, or warning sign that may suggest corruption, fraud, or unethical conduct requiring further review or investigation.

8.0 PROHIBITED CONDUCT

Any form of corruption, fraud, or dishonest conduct is strictly prohibited within ACEECA. Prohibited conduct includes acts committed directly or indirectly, whether by a single individual acting alone or in collusion with others, and whether attempted or completed. The organization considers both actual misconduct and deliberate efforts to conceal or facilitate misconduct to be serious violations of this Policy.

The following categories of conduct are expressly forbidden.

8.1 Bribery and Improper Payments

No person acting on behalf of ACEECA shall offer, promise, authorize, request, or accept any payment, gift, favor, hospitality, employment opportunity, donation, or other benefit intended to improperly influence a decision or secure an unfair advantage.

This prohibition applies to dealings with public officials, donors, suppliers, implementing partners, community leaders, beneficiaries, and any other stakeholder. It also applies regardless of whether the benefit is provided directly or through an intermediary such as an agent, consultant, or relative.

8.2 Facilitation Payments

ACEECA prohibits facilitation payments, including small unofficial payments made to expedite routine government actions such as permits, customs clearance, inspections, or administrative approvals.

The only exception is where an individual faces an immediate and credible threat to personal safety and has no practical alternative. In such cases, the payment and surrounding circumstances must be reported in writing to the Chief Executive Officer within twenty-four hours.

8.3 Fraudulent Financial Reporting

The intentional falsification, alteration, destruction, or concealment of financial records, supporting documentation, accounting entries, budgets, bank reconciliations, or reports is prohibited.

This includes the use of forged receipts, fabricated invoices, duplicate claims, undisclosed liabilities, or manipulation of records to misrepresent the financial position or performance of the organization.

8.4 False Expense Claims

Submitting inaccurate, inflated, duplicate, or fictitious claims for travel, accommodation, per diem, procurement, or reimbursement constitutes fraud and is prohibited.

8.5 Embezzlement and Misappropriation

No person may divert, misuse, or convert organizational funds, equipment, supplies, or other assets for personal benefit or for unauthorized purposes.

This prohibition applies to donor funds, grants, petty cash, project resources, vehicles, fuel, computers, digital subscriptions, and all other assets under ACEECA's custody or control.

8.6 Procurement Manipulation

Any attempt to influence procurement decisions improperly is prohibited. This includes bid rigging, collusion among suppliers, splitting purchases to avoid approval thresholds, tailoring specifications to favor a particular vendor, and accepting kickbacks or commissions.

8.7 Conflict of Interest Abuse

Individuals may not participate in decisions where they have an undisclosed personal, financial, or family interest. Concealing a conflict of interest or using one's position to benefit related parties is a serious violation of this Policy.

8.8 Theft and Unauthorized Use of Assets

Theft, unauthorized borrowing, misuse, or negligent handling of organizational assets is prohibited. Assets include cash, vehicles, computers, software, office equipment, intellectual property, and confidential information.

8.9 Payroll and Human Resource Fraud

Creating fictitious employees, manipulating timesheets, falsifying qualifications, unauthorized salary adjustments, or misrepresenting recruitment outcomes are prohibited.

8.10 Grant and Programme Fraud

It is prohibited to falsify beneficiary data, inflate outputs, misstate impact results, fabricate attendance lists, or misuse programme resources intended for communities and environmental initiatives.

8.11 Data and Cyber Fraud

Unauthorized alteration, deletion, theft, or misuse of electronic records, passwords, databases, and digital systems is prohibited.

8.12 Obstruction of Investigations

Destroying evidence, intimidating witnesses, providing false statements, or otherwise interfering with an investigation constitutes misconduct and may result in separate disciplinary action.

8.13 Retaliation Against Whistleblowers

Any adverse action against a person who reports concerns in good faith or participates in an investigation is strictly prohibited.

8.14 Concealment and Failure to Report

Knowingly concealing misconduct or failing to report credible suspicions of corruption or fraud may itself constitute a breach of this Policy.

8.15 Money Laundering and Illicit Financial Activity

ACEECA prohibits the use of its systems, bank accounts, or programmes to conceal the proceeds of unlawful conduct or to facilitate illicit financial transactions.

8.16 Attempted Misconduct

Attempts to commit any prohibited act, even if unsuccessful, shall be treated as violations of this Policy and addressed accordingly.

9.0 ROLES AND RESPONSIBILITIES

The prevention of corruption and fraud is a shared responsibility across all levels of Africa Centre for Environment, Energy, and Climate Advocacy (ACEECA). While the Board of Directors provides strategic oversight, every individual associated with the organization has a duty to uphold integrity, safeguard resources, and report suspected misconduct.

9.1 Board of Directors

The Board of Directors bears ultimate responsibility for ensuring that ACEECA maintains a strong ethical culture and effective governance systems. The Board shall approve this Policy and any subsequent amendments, provide strategic oversight, and ensure that management establishes adequate internal controls to prevent and detect corruption and fraud.

The Board shall review significant allegations involving senior leadership, receive reports on investigations and control weaknesses, and ensure that corrective actions are implemented. Where appropriate, the Board may establish an Audit, Risk, and Compliance Committee to support detailed oversight.

The Board shall also ensure that sufficient resources are allocated to strengthen governance, internal audit, staff training, and compliance functions.

9.2 Chief Executive Officer (CEO)

The Chief Executive Officer is responsible for implementing this Policy and fostering a culture of integrity throughout the organization. The CEO shall ensure that anti-corruption principles are integrated into strategy, operations, partnerships, and organizational decision-making.

The CEO shall take prompt action when allegations are reported, authorize investigations where appropriate, ensure corrective measures are implemented, and report significant cases to the Board of Directors and donors when required.

The CEO shall also ensure that all staff and partners are aware of their obligations under this Policy and that retaliation against whistleblowers is strictly prohibited.

9.3 Directors and Senior Management

Directors and senior managers are responsible for embedding internal controls and ethical standards within their departments and programmes. They shall ensure compliance with procurement procedures, financial controls, grant conditions, and documentation requirements.

Management must lead by example, monitor transactions for irregularities, address red flags promptly, and encourage staff to raise concerns without fear.

They are also responsible for implementing recommendations arising from audits and investigations and for continuously strengthening systems and procedures.

9.4 Finance and Administration Department

The Finance and Administration Department plays a central role in safeguarding organizational assets and ensuring sound financial management.

Its responsibilities include maintaining accurate records, conducting reconciliations, monitoring budgets, verifying supporting documentation, enforcing segregation of duties, and reporting unusual transactions.

The department shall cooperate fully with internal and external auditors and provide timely financial information to management and the Board.

9.5 Procurement and Logistics Personnel

Individuals involved in procurement and logistics shall ensure that purchasing decisions are transparent, competitive, and based solely on objective criteria.

They shall maintain complete procurement documentation, verify supplier legitimacy, declare conflicts of interest, and reject any offers of kickbacks or improper inducements.

Assets under their control must be accurately recorded, protected, and used exclusively for authorized purposes.

9.6 Human Resource Function

The Human Resource function shall integrate anti-corruption requirements into recruitment, orientation, performance management, and disciplinary procedures.

Human Resource personnel shall conduct appropriate background checks where feasible, obtain signed acknowledgements of relevant policies, and coordinate disciplinary actions resulting from substantiated misconduct.

The department shall also support awareness programmes and ensure confidentiality in handling reports and investigations.

9.7 Employees

All employees are individually responsible for acting honestly, complying with this Policy, safeguarding organizational assets, and reporting any reasonable suspicion of corruption or fraud.

Employees must avoid conflicts of interest, maintain accurate records, cooperate with investigations, and complete mandatory training.

Ignorance of this Policy does not excuse misconduct or failure to report concerns.

9.8 Volunteers, Interns, and Temporary Personnel

Volunteers, interns, and temporary staff are subject to the same ethical standards and reporting obligations as employees.

They shall receive appropriate orientation and are expected to comply fully with this Policy during their engagement with ACEECA.

9.9 Consultants, Contractors, and Service Providers

All consultants, contractors, and service providers engaged by ACEECA shall conduct their work with integrity and comply with applicable anti-corruption provisions contained in their contracts.

Any violation may result in termination of contract, recovery of losses, exclusion from future opportunities, and referral to authorities where warranted.

9.10 Suppliers and Vendors

Suppliers and vendors are expected to compete fairly and refrain from bribery, collusion, invoice manipulation, and other unethical practices.

ACEECA reserves the right to conduct due diligence, audit records related to funded activities, and suspend or debar vendors who violate this Policy.

9.11 Implementing Partners and Grant Recipients

Partner organizations and grant recipients must maintain effective controls and use funds solely for authorized purposes.

They are required to report suspected misconduct promptly and to cooperate fully with audits, monitoring visits, and investigations.

Failure to comply may result in suspension of funding, termination of agreements, and recovery of disbursed funds.

9.12 Donors and Stakeholders

ACEECA shall maintain transparent communication with donors and other stakeholders regarding material incidents of fraud or corruption when disclosure is required by law, contract, or principles of accountability.

The organization shall work collaboratively with stakeholders to strengthen systems and protect development resources.

9.13 Every Individual Associated with ACEECA

Ultimately, safeguarding integrity is the responsibility of every person connected to ACEECA. Each individual is expected to exercise sound judgment, ask questions when uncertain, and act courageously in protecting the organization's mission and the communities it serves.

10.0 PREVENTION AND INTERNAL CONTROL MEASURES

African Centre for Environment, Energy, and Climate Advocacy (ACEECA) recognizes that the most effective way to combat corruption and fraud is to establish strong preventive systems and a culture of ethical conduct. Prevention is not limited to financial controls; it encompasses leadership behavior, organizational values, transparent procedures, and continuous vigilance.

ACEECA shall design, implement, and maintain internal control mechanisms proportionate to the nature, size, and complexity of its operations. These controls shall be reviewed regularly and strengthened whenever vulnerabilities are identified.

10.1 Ethical Leadership and Organizational Culture

The tone set by leadership is fundamental to preventing misconduct. The Board of Directors, Chief Executive Officer, and senior management shall consistently demonstrate integrity, transparency, and accountability in their decisions and conduct.

Leaders shall communicate clearly that corruption and fraud are unacceptable under any circumstances. They shall encourage open dialogue, respond promptly to concerns, and ensure that staff and partners understand that ethical conduct is a core condition of association with ACEECA.

10.2 Segregation of Duties

Key responsibilities shall be separated so that no single individual controls all stages of a transaction. Duties involving authorization, custody of assets, recording of transactions, and reconciliation shall be assigned to different individuals wherever practicable.

Segregation of duties reduces opportunities for concealment and provides an important check on errors and misconduct.

10.3 Authorization and Approval Controls

All financial and operational transactions must be supported by proper documentation and approved in accordance with delegated authority limits.

Approvals shall be based on verification that expenditures are legitimate, budgeted, adequately documented, and consistent with donor agreements and organizational policies.

Unauthorized commitments and expenditures are prohibited.

10.4 Documentation and Record Keeping

ACEECA shall maintain accurate, complete, and timely records for all transactions, decisions, and programme activities.

Supporting documents, including contracts, invoices, receipts, attendance registers, timesheets, bank statements, and monitoring reports, shall be retained securely in accordance with applicable laws, donor requirements, and record retention policies.

No record may be falsified, altered, or destroyed to conceal misconduct.

10.5 Budgetary Control and Financial Monitoring

Approved budgets shall serve as the basis for expenditure authorization and monitoring.

Management shall review actual expenditures against budgets regularly and investigate significant variances, unusual trends, and unsupported transactions.

Programme managers are accountable for ensuring that resources are used efficiently and exclusively for approved objectives.

10.6 Bank and Cash Controls

Bank accounts shall be opened only with proper authorization and operated under established signatory arrangements.

Bank reconciliations shall be prepared promptly and reviewed independently. Cash holdings shall be minimized, securely stored, and subject to periodic surprise counts.

Petty cash shall be maintained under strict procedures with clear accountability and supporting documentation.

10.7 Procurement Controls

Procurement processes shall be transparent, competitive, and well documented.

Vendor selection shall be based on objective criteria such as price, quality, capacity, and compliance. Due diligence shall be conducted to confirm supplier legitimacy and ownership where appropriate.

Any deviation from standard procedures must be justified in writing and approved at the appropriate level.

10.8 Asset Management

All equipment and tangible assets shall be recorded in an asset register containing identification details, location, custodian, and condition.

Periodic physical verification shall be conducted, and discrepancies investigated promptly.

Assets shall be used solely for authorized organizational purposes and protected from loss, misuse, and unauthorized disposal.

10.9 Human Resource Controls

Recruitment, promotion, compensation, and performance management shall be conducted transparently and based on merit.

Personnel records shall be maintained accurately, and payroll changes shall require appropriate approval and verification.

Background and reference checks may be conducted where proportionate to the level of responsibility.

10.10 Information Technology and Cybersecurity Controls

Access to financial systems, databases, and electronic records shall be restricted to authorized users.

Passwords, user permissions, backups, and cybersecurity safeguards shall be maintained to prevent unauthorized access, alteration, or loss of information.

Digital audit trails shall be preserved to support monitoring and investigations.

10.11 Due Diligence on Partners and Third Parties

Before entering into significant partnerships, grants, or contracts, ACEECA shall conduct reasonable due diligence to assess integrity, ownership, legal standing, and operational capacity.

Higher-risk relationships may require enhanced review, contractual safeguards, and monitoring.

10.12 Conflict of Interest Declarations

Board members, staff, consultants, and other relevant individuals shall disclose actual, potential, or perceived conflicts of interest promptly and in writing.

Disclosed conflicts shall be assessed and managed through recusal, reassignment, or other appropriate measures.

10.13 Training and Awareness

All personnel shall receive induction and periodic refresher training on this Policy and related procedures.

Training shall emphasize ethical decision-making, recognition of red flags, reporting channels, and individual responsibilities.

10.14 Monitoring and Internal Audit

Management shall monitor compliance continuously through reviews, reconciliations, spot checks, and supervisory oversight.

Where feasible, internal audit or independent assurance functions shall assess the effectiveness of controls and recommend improvements.

10.15 External Audit and Donor Oversight

ACEECA shall cooperate fully with external auditors, donor assessments, and regulatory reviews.

Findings related to fraud risk or control weaknesses shall be addressed promptly through documented corrective action plans.

10.16 Continuous Improvement

Anti-corruption and fraud prevention measures shall evolve in response to lessons learned, emerging risks, audit findings, and changes in operational context.

The organization is committed to strengthening its systems continuously to ensure that resources are protected and used for the benefit of communities, ecosystems, and future generations.

11.0 GIFTS, HOSPITALITY, AND OTHER BENEFITS

ACEECA recognizes that modest expressions of courtesy may arise in the course of professional relationships. However, gifts, hospitality, and other benefits can create actual or perceived conflicts of interest and may be used to improperly influence decisions. This section establishes clear standards to preserve impartiality and public confidence.

11.1 General Principle

No Board member, employee, volunteer, consultant, contractor, or partner acting on behalf of ACEECA shall offer, solicit, or accept any gift, entertainment, travel, accommodation, favor, discount, service, or other benefit that could influence, or reasonably appear to influence, the performance of official duties.

All decisions concerning procurement, recruitment, grant-making, partnerships, and programme implementation must be based solely on objective and transparent criteria.

11.2 Acceptable Tokens of Courtesy

Nominal items of low value may be accepted when they are infrequent, culturally appropriate, lawful, and clearly intended as gestures of goodwill rather than inducements.

Examples may include branded pens, calendars, notebooks, or modest refreshments provided during meetings.

Such items must never affect decision-making or create a sense of obligation.

11.3 Prohibited Gifts and Benefits

The following are strictly prohibited regardless of value:

1. Cash or cash equivalents, including gift cards, vouchers, or mobile money transfers.

2. Gifts offered during procurement, recruitment, grant evaluations, audits, or regulatory reviews.
3. Travel, accommodation, or entertainment not expressly authorized by ACEECA.
4. Personal favors, discounts, or services not available to the general public.
5. Any item or benefit intended to secure preferential treatment.
6. Repeated gifts from the same source that could create undue influence.

11.4 Offering Gifts on Behalf of ACEECA

Gifts, tokens, or hospitality offered by ACEECA to stakeholders must be reasonable, transparent, lawful, and consistent with organizational values and approved budgets.

Such gestures shall never be used to obtain improper advantages or influence official decisions.

11.5 Disclosure and Approval

Where an individual is uncertain whether a gift or benefit may be accepted, they must seek guidance from their supervisor or the Chief Executive Officer before acceptance.

Gifts above the threshold established by management, or any gift that may raise ethical concerns, must be disclosed in writing and recorded in a Gift Register.

Management may require that certain gifts be declined, returned, or surrendered to the organization.

11.6 Gifts That Cannot Be Politely Refused

In some cultural or diplomatic settings, refusing a gift may be impractical or disrespectful. In such circumstances, the item shall be reported immediately and surrendered to ACEECA unless management determines that personal retention is appropriate and poses no conflict.

11.7 Hospitality and Sponsored Events

Attendance at conferences, meals, or events funded by third parties may only be accepted when the purpose is legitimate, the value is reasonable, and participation does not compromise independence.

Prior approval shall be obtained where required by internal procedures.

11.8 Registers and Monitoring

ACEECA shall maintain appropriate registers to document gifts, hospitality, and declarations requiring disclosure.

These records may be reviewed by management, auditors, and the Board to ensure compliance and identify emerging risks.

12.0 CONFLICTS OF INTEREST

Conflicts of interest can undermine objectivity and erode trust even where no improper conduct has occurred. ACEECA requires all individuals associated with the organization to act solely in the best interests of the organization and the communities it serves.

12.1 Duty to Avoid and Disclose Conflicts

Every individual must avoid situations in which personal, financial, family, or other interests interfere, or appear to interfere, with the impartial discharge of responsibilities.

Actual, potential, and perceived conflicts of interest must be disclosed promptly in writing.

12.2 Examples of Conflicts of Interest

Conflicts may arise where an individual:

1. Participates in awarding a contract to a company owned by a relative or close associate.
2. Influences recruitment involving a family member or personal friend.

3. Holds a financial interest in a supplier, partner, or competitor.
4. Uses confidential information for personal benefit.
5. Accepts outside employment that interferes with organizational duties.
6. Receives personal benefits from organizations seeking favorable decisions.

12.3 Annual Declarations

Board members, senior management, and designated personnel shall complete annual conflict of interest declarations and update them whenever circumstances change.

12.4 Management of Conflicts

Where a conflict is disclosed, ACEECA shall determine appropriate measures, which may include recusal from discussions and decisions, reassignment of duties, enhanced oversight, or termination of the relationship where the conflict cannot be managed adequately.

12.5 Failure to Disclose

Failure to disclose a conflict of interest, or participation in decisions despite a known conflict, constitutes a serious breach of this Policy and may result in disciplinary or contractual action.

13.0 PROCUREMENT INTEGRITY

Procurement is particularly vulnerable to corruption and fraud because it involves the expenditure of organizational resources and interactions with external parties. ACEECA is committed to conducting all procurement activities fairly, transparently, competitively, and in the best interests of the organization.

All procurement shall comply with ACEECA's Procurement Policy and any applicable donor regulations. No person may manipulate procurement processes for personal gain or to favor specific suppliers improperly.

13.1 Principles Governing Procurement

All procurement activities undertaken by Africa Centre for Environment, Energy, and Climate Advocacy (ACEECA) shall be guided by the principles of fairness, transparency, competition, value for money, accountability, and ethical conduct.

Purchasing decisions shall be based exclusively on legitimate business considerations, including quality, price, technical capacity, delivery timelines, sustainability considerations, and compliance with specifications and donor requirements. Personal relationships, gifts, inducements, and undisclosed interests shall never influence procurement outcomes.

13.2 Competitive Procurement

Except where justified under approved procedures, procurement shall be conducted through open and competitive methods appropriate to the value and complexity of the purchase.

The use of multiple quotations, formal tenders, or request for proposals shall be documented, and all bids shall be evaluated against predetermined criteria. Deviations from competitive methods must be approved in writing and supported by a clear rationale.

13.3 Supplier Due Diligence

Before engaging suppliers, ACEECA shall conduct reasonable due diligence to verify their legal existence, ownership, tax compliance, reputation, and operational capacity.

Where risks are identified, ACEECA may require additional information, references, beneficial ownership disclosures, or certifications relating to anti-corruption compliance.

13.4 Bid Evaluation and Award

Bid evaluations shall be performed objectively by authorized personnel or committees. Evaluation records shall document the basis for recommendations and approvals.

Individuals with actual or perceived conflicts of interest must disclose those interests and recuse themselves from the process.

Contracts shall only be awarded after all approvals are obtained and documentation is complete.

13.5 Contract Administration

After award, contracts shall be managed to ensure that goods and services are delivered as agreed and that payments are made only for verified performance.

Changes in scope, price, or duration must be justified, documented, and approved according to delegated authority.

13.6 Prohibited Procurement Practices

The following practices are strictly prohibited:

1. Bid rigging and collusion among suppliers.
2. Splitting purchases to avoid approval thresholds.
3. Tailoring specifications to favor a particular vendor.
4. Acceptance of kickbacks, commissions, or personal benefits.
5. Use of fictitious or undisclosed related-party suppliers.
6. Payment for goods or services not received.
7. Falsification of quotations or procurement records.

13.7 Debarment and Suspension of Suppliers

ACEECA may suspend, terminate, or debar suppliers and contractors found to have engaged in fraud, corruption, unethical conduct, or serious performance failures.

Debarment decisions may be shared with donors or consortium partners where appropriate and lawful.

14.0 FINANCIAL MANAGEMENT AND ASSET PROTECTION

The effective stewardship of resources is central to ACEECA's credibility and mission. All funds and assets entrusted to the organization shall be managed prudently, transparently, and solely for authorized purposes.

14.1 Use of Funds

Organizational funds, including grants, donations, and internally generated resources, shall be used only for legitimate and approved activities consistent with budgets, contracts, and donor agreements.

Diversion of funds for personal or unauthorized purposes is strictly prohibited.

14.2 Accurate Accounting

All financial transactions shall be recorded completely, accurately, and in a timely manner in accordance with applicable accounting standards and organizational procedures.

Off-the-books accounts, undisclosed liabilities, and intentionally misleading entries are prohibited.

14.3 Supporting Documentation

Payments shall be supported by authentic and sufficient documentation, including invoices, receipts, contracts, approvals, and proof of delivery or service completion.

No payment shall be processed on the basis of fabricated or altered records.

14.4 Asset Safeguarding

Physical and intangible assets shall be protected through registration, restricted access, maintenance, insurance where appropriate, and periodic verification.

Losses, theft, or unexplained discrepancies shall be reported immediately and investigated.

14.5 Inventory and Stock Management

Inventories and consumable items shall be recorded and monitored to prevent loss, misuse, or unauthorized distribution.

Regular stock counts shall be conducted and reconciled to records.

14.6 Travel and Expense Controls

Travel advances, per diem, and reimbursements shall be subject to clear authorization, supporting documentation, and post-travel accountability.

Inflated, duplicate, or fictitious claims constitute fraud.

14.7 Restricted and Donor Funds

Funds subject to donor restrictions shall be tracked separately where necessary and used strictly in accordance with applicable agreements.

Material deviations shall be disclosed and addressed promptly.

14.8 Insurance and Risk Transfer

Where appropriate, ACEECA shall maintain insurance coverage to protect assets and mitigate operational risks.

Insurance does not diminish individual accountability for misconduct or negligence.

15.0 REPORTING SUSPECTED CORRUPTION AND FRAUD

ACEECA is committed to creating an organizational environment in which concerns about corruption, fraud, and unethical conduct can be raised safely, confidentially, and without fear of retaliation. Timely reporting is essential to protecting organizational resources, maintaining donor confidence, and preserving the trust of the communities ACEECA serves.

Every individual associated with ACEECA has both a right and a responsibility to report any reasonable suspicion of misconduct. Reporting concerns in good faith is considered an act of integrity and organizational stewardship.

15.1 Duty to Report

Board members, employees, volunteers, interns, consultants, contractors, suppliers, implementing partners, beneficiaries, and other stakeholders who become aware of suspected corruption, fraud, or related misconduct shall report the matter promptly.

A report may be made even where the individual does not possess conclusive evidence. What is required is a reasonable belief, based on facts or observations, that misconduct may have occurred or may be occurring.

Failure to report credible concerns may constitute a breach of this Policy and may result in disciplinary or contractual consequences.

15.2 Reporting Channels

Reports may be submitted through one or more of the following channels:

1. Immediate supervisor or line manager.
2. Chief Executive Officer.
3. Chairperson of the Board of Directors.
4. Audit, Risk, and Compliance Committee, where established.
5. Human Resource Department.
6. Dedicated whistleblower email address or hotline.

7. Secure online reporting platform, if available.
8. External authorities where required by law.

Individuals may use whichever reporting channel they believe is most appropriate, particularly where concerns involve senior management or where they fear that internal reporting may compromise confidentiality.

15.3 Anonymous Reporting

ACEECA accepts anonymous reports and will assess them to the extent possible based on the information provided.

While anonymity may limit the organization's ability to seek clarification or provide feedback, anonymous disclosures will be treated seriously and reviewed objectively.

15.4 Information to Include in a Report

Individuals are encouraged to provide as much relevant information as possible, including:

1. Names and positions of persons involved.
2. Description of the suspected conduct.
3. Dates, locations, and circumstances.
4. Estimated financial impact, if known.
5. Supporting documents or other evidence.
6. Names of potential witnesses.
7. Any steps already taken.

Reports need not contain every detail in order to be considered.

15.5 Confidentiality

All reports shall be handled with the highest degree of confidentiality consistent with the need to conduct a fair and effective review and to comply with legal obligations.

Information will be disclosed only to those who have a legitimate need to know.

15.6 Good Faith Reporting

Individuals who report concerns honestly and with a genuine belief that misconduct may have occurred are protected under this Policy, even if an investigation later determines that no wrongdoing took place.

Knowingly false or malicious allegations, however, may result in disciplinary action.

15.7 Immediate Protection of Evidence

Persons who become aware of suspected misconduct should preserve relevant documents, emails, electronic files, and other records and should avoid altering or destroying potential evidence.

16.0 WHISTLEBLOWER PROTECTION AND NON-RETALIATION

ACEECA recognizes that individuals may hesitate to report concerns if they fear retaliation. The organization therefore provides strong protections to ensure that people who speak up in good faith are treated with fairness, dignity, and respect.

16.1 Commitment to Protection

No person shall be subjected to dismissal, demotion, harassment, intimidation, discrimination, loss of benefits, threats, reputational harm, or any other adverse action because they reported a concern, participated in an investigation, or refused to engage in prohibited conduct.

16.2 Retaliation as a Serious Violation

Retaliation is itself a serious breach of this Policy and shall result in disciplinary or contractual action, including possible termination.

16.3 Interim Protective Measures

Where appropriate, ACEECA may implement measures to protect reporters and witnesses during an investigation. Such measures may include confidentiality safeguards, reassignment of reporting lines, temporary adjustments to duties, or other reasonable accommodations.

16.4 Reporting Retaliation

Any person who believes they have experienced retaliation should report the matter immediately through the channels described in this Policy. Allegations of retaliation shall be investigated promptly and independently.

16.5 Supportive Organizational Culture

ACEECA shall promote an environment in which raising concerns is viewed as a responsible contribution to institutional integrity rather than an act of disloyalty. Leaders at all levels are expected to encourage openness and respond constructively to reports of suspected misconduct.

17.0 INVESTIGATION OF ALLEGATIONS

ACEECA is committed to ensuring that all allegations of corruption, fraud, and related misconduct are addressed promptly, objectively, thoroughly, and fairly. Investigations shall be conducted in a manner that protects the rights of all parties, preserves evidence, and maintains the integrity and reputation of the organization.

The purpose of an investigation is to establish facts, determine whether misconduct has occurred, quantify losses where applicable, identify control weaknesses, and recommend corrective and disciplinary measures.

17.1 Preliminary Assessment

Upon receipt of a report, ACEECA shall conduct an initial assessment to determine whether the allegation falls within the scope of this Policy, whether there is sufficient information to warrant further action, and whether immediate protective measures are required.

The preliminary assessment may result in one or more of the following actions:

1. Closure of the matter where the allegation is clearly unfounded or outside the scope of the Policy.
2. Referral to another policy or process, such as Human Resource or safeguarding procedures.
3. Initiation of a formal investigation.
4. Referral to external auditors, donors, regulators, or law enforcement agencies.
5. Implementation of urgent protective measures.

17.2 Appointment of Investigators

Investigations may be conducted by internal personnel with appropriate expertise or by independent external investigators, auditors, legal counsel, or forensic specialists where warranted by the seriousness or complexity of the matter.

Investigators shall be impartial, competent, and free from actual or perceived conflicts of interest.

17.3 Investigation Procedures

Investigations may include review of documents and electronic records, interviews with relevant persons, forensic analysis, site visits, reconciliation of financial data, and examination of internal controls.

All individuals associated with ACEECA are required to cooperate fully and honestly with investigations and to provide access to relevant information and assets.

17.4 Administrative Measures During Investigation

To protect evidence, assets, and the integrity of the investigation, ACEECA may take temporary administrative measures, including suspension with or without pay in accordance with applicable law, restriction of system access, reassignment of duties, or temporary removal of signing authority.

Such measures are precautionary and do not constitute a finding of wrongdoing.

17.5 Rights of Persons Concerned

Individuals who are the subject of an investigation shall be treated fairly and respectfully and shall be given an opportunity to respond to relevant allegations before conclusions are reached, unless doing so would materially compromise the investigation.

The initiation of an investigation does not imply guilt.

17.6 Investigation Reports

At the conclusion of the investigation, a written report shall summarize the allegations, methodology, evidence reviewed, findings of fact, conclusions, financial impact, and recommendations.

Reports shall be submitted to the appropriate decision-making authority, including senior management, the Chief Executive Officer, the Board of Directors, or designated committees.

17.7 Standard of Proof

Administrative decisions under this Policy shall generally be based on the balance of probabilities, meaning that it is more likely than not that the misconduct occurred.

17.8 Reporting to External Parties

Where required by law, donor agreements, regulatory obligations, or considerations of accountability, ACEECA may report substantiated or material allegations to donors, government agencies, law enforcement authorities, insurers, or other relevant bodies.

18.0 DISCIPLINARY ACTIONS AND SANCTIONS

Any person found to have engaged in corruption, fraud, retaliation, obstruction, or other serious misconduct shall be subject to appropriate sanctions proportionate to the nature and gravity of the violation.

Sanctions may be imposed regardless of whether financial loss has occurred.

18.1 Disciplinary Measures for Employees

Depending on the circumstances, disciplinary action may include:

1. Verbal or written warning.
2. Mandatory training or counseling.
3. Restitution or recovery of losses.
4. Suspension.
5. Demotion or reassignment.
6. Termination of employment.
7. Referral to law enforcement or regulatory authorities.

18.2 Actions Affecting Board Members

Board members who violate this Policy may be censured, suspended, removed from office in accordance with the Constitution and governance instruments, and referred to external authorities where appropriate.

18.3 Contractual Remedies for Third Parties

Consultants, suppliers, contractors, and partners who violate this Policy may be subject to termination of contracts, withholding of payments, recovery of funds, debarment from future engagements, and legal proceedings.

18.4 Recovery of Losses

ACEECA shall take all reasonable steps to recover misappropriated funds and assets, including deductions, insurance claims, civil proceedings, and negotiated settlements where appropriate and lawful.

19.0 REFERRAL TO LAW ENFORCEMENT AND REGULATORY AUTHORITIES

Where evidence suggests that criminal conduct or significant regulatory violations have occurred, ACEECA may refer the matter to appropriate authorities, including the Ethics and Anti-Corruption Commission, the Directorate of Criminal Investigations, the Office of the Director of Public Prosecutions, the Financial Reporting Centre, or equivalent authorities in other jurisdictions.

The organization shall cooperate fully with lawful investigations and proceedings while protecting confidential and privileged information to the extent permitted by law.

20.0 DONOR NOTIFICATION AND EXTERNAL DISCLOSURE

ACEECA recognizes its duty of accountability to donors, partners, regulators, and the public.

Where required by contractual obligations, law, or materiality considerations, the organization shall notify relevant donors and stakeholders of confirmed or suspected fraud and corruption, the estimated impact, actions taken, and measures implemented to prevent recurrence.

Disclosures shall be timely, accurate, and coordinated through authorized leadership.

21.0 RECORD RETENTION AND EVIDENCE MANAGEMENT

All records relating to reports, investigations, findings, disciplinary actions, and recoveries shall be maintained securely and confidentially.

Access shall be restricted to authorized personnel. Records shall be retained for at least seven years, or longer where required by law, donor agreements, insurance conditions, or pending legal proceedings.

Electronic evidence shall be preserved in a manner that maintains authenticity and integrity.

22.0 TRAINING, COMMUNICATION, AND AWARENESS

ACEECA shall ensure that this Policy is communicated effectively and understood by all relevant persons.

New employees and associates shall receive induction on anti-corruption obligations, and periodic refresher training shall be provided thereafter.

The organization may also conduct targeted awareness campaigns, scenario-based exercises, and integrity dialogues to strengthen ethical decision-making.

23.0 MONITORING, AUDIT, AND CONTINUOUS IMPROVEMENT

The effectiveness of this Policy shall be monitored through management reviews, internal controls, audits, risk assessments, and analysis of incidents and trends.

Recommendations arising from investigations, audits, and stakeholder feedback shall be implemented promptly to strengthen systems and address root causes.

ACEECA is committed to continuous learning and to evolving its anti-corruption framework in response to emerging risks and international best practices.

24.0 POLICY REVIEW AND AMENDMENT

This Policy shall be reviewed at least once every three years, or earlier if warranted by changes in law, donor requirements, operational risks, or organizational structure.

Any amendment shall be approved by the Board of Directors.

25.0 ACKNOWLEDGEMENT OF RESPONSIBILITY

All persons covered by this Policy may be required to sign an acknowledgment confirming that they have read, understood, and agree to comply with its provisions.

Failure to sign an acknowledgment does not exempt any individual from their obligations under this Policy.

26.0 STATEMENT OF COMMITMENT

We, the Board of Directors, management, employees, volunteers, consultants, contractors, partners, and all persons associated with Africa Centre for Environment, Energy, and Climate Advocacy (ACEECA), solemnly affirm our unwavering commitment to the highest standards of integrity, honesty, transparency, and accountability in all aspects of our work.

We recognize that the resources entrusted to ACEECA represent the confidence and goodwill of communities, donors, development partners, governments, and supporters who believe in our mission to advance environmental protection, climate action, clean energy, and climate advocacy across Africa. We acknowledge that these resources are held in trust and must be managed responsibly, ethically, and exclusively for the purposes for which they are intended.

We categorically reject corruption, fraud, bribery, embezzlement, collusion, theft, abuse of office, conflicts of interest, and all other forms of misconduct that undermine institutional credibility and deprive communities and ecosystems of the support they deserve.

We commit ourselves to:

1. Conducting all activities with integrity and professionalism.
2. Complying fully with this Anti-Corruption and Fraud Prevention Policy and all related policies and procedures.
3. Safeguarding organizational funds, assets, information, and reputation.
4. Avoiding and disclosing conflicts of interest promptly and honestly.
5. Refusing to offer, solicit, or accept bribes or improper benefits.
6. Reporting suspected misconduct in good faith and without delay.
7. Cooperating fully with audits, reviews, and investigations.
8. Protecting whistleblowers and supporting a culture of openness and accountability.
9. Taking corrective action to address weaknesses and prevent recurrence.
10. Promoting ethical leadership and responsible stewardship in every area of our work.

We understand that integrity is not merely a compliance requirement; it is a fundamental expression of our values and our duty to the people, institutions, and natural systems we serve. We acknowledge that each of us bears personal responsibility for protecting ACEECA from corruption and fraud and for ensuring that our conduct reflects the principles upon which the organization was founded.

By this Statement of Commitment, we pledge to uphold the trust placed in ACEECA and to work collectively to build an organization that exemplifies ethical leadership, good governance, and accountability in the pursuit of sustainable development, environmental justice, and climate resilience for present and future generations.

By working collectively to uphold these standards, ACEECA strengthens not only its own institution, but also the broader movement for ethical leadership, sustainable development, and climate justice for present and future generations.

Approved and Adopted by the Board of Directors of ACEECA