

## **ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY**

*Last Updated: August 2023*

### **Introduction**

Think Education is committed to conducting its operations with the highest level of ethical standards and integrity. This Anti-Fraud, Bribery, and Corruption Policy outlines our approach to preventing, detecting, reporting, and addressing fraud, bribery, and corruption within our organization.

### **Policy Statements**

- **Zero-Tolerance Policy**  
Think Education maintains a strict zero-tolerance policy towards fraud, bribery, and corruption committed by any staff, directors, members of the Governing Council, consultants, partners, or beneficiaries.
- **Internal Controls**  
Effective internal controls and processes are essential for preventing and detecting fraud, bribery, and corruption. Think Education is committed to having robust internal controls in place to safeguard against these risks.
- **Integrity and Accountability**  
All staff, managers, directors, Board members, and consultants are expected to act with honesty, integrity, and transparency in all their dealings and to responsibly manage the resources entrusted to them.
- **Responsible Use of Resources**  
Partners and beneficiaries receiving any resources from Think Education are expected to use these resources for their intended purposes and in strict compliance with the terms and objectives of their contractual agreements with Think Education.
- **Reporting Obligations**  
All staff are required to promptly report any incidents or suspicions of fraud, bribery, or corruption to their managers or designated authorities within Think Education. Failure to report such incidents may result in disciplinary action.
- **Response to Incidents**  
Think Education will respond to reported incidents of fraud, bribery, and corruption with appropriate and proportionate measures, which may include disciplinary actions, legal actions, or other appropriate remedies, depending on the circumstances of each case.
- **Donor Requirements**  
Think Education acknowledges and complies with the requirements of donors regarding procedures for mitigating the risk of fraud, bribery, and corruption, as well as the reporting of suspicions or allegations related to these issues.
- **Training**  
Think Education is committed to providing training to all staff on how to implement and adhere to this policy effectively.

## **Definitions**

- **Fraud**  
Fraud is defined as knowingly making an untrue or misleading representation with the intention of gaining an unauthorized benefit or causing a loss, or risk of loss, to Think Education.
- **Bribery**  
Bribery involves the offering, promising, giving, accepting, or soliciting of money, gifts, or other advantages as inducements to engage in illegal activities or breaches of trust while conducting Think Education's activities.
- **Corruption**  
Corruption encompasses the abuse of entrusted power for personal gain, including dishonest or fraudulent behavior by individuals in positions of power, offering, giving, or receiving bribes to influence the actions of those in positions of power, and the diversion of funds for personal gain.

## **Reporting Incidents**

All staff must immediately report any actual, potential, or suspected incidents of fraud, bribery, or corruption. These reporting obligations extend to incidents related to funds or assets held by Think Education or funds or assets provided by Think Education to other organizations.

## **Investigation and Consequences**

Think Education will conduct thorough investigations into reported incidents or suspicions of fraud, bribery, or corruption. Staff members are required to cooperate fully in these investigations by providing all relevant information.

Disciplinary action will be taken against any Think Education staff involved in such incidents, as fraud, bribery, or corruption is considered gross misconduct. Legal action may also be pursued in cases of suspected criminal wrongdoing.

Think Education may seek to recover losses through voluntary agreements or legal action. Additionally, Think Education will review its systems and procedures following any incidents to prevent similar occurrences in the future.

## **Exceptions**

In situations where a staff member's personal safety or the safety of another person is at risk if a payment is not made, such payment should be made without fear of recrimination. Any such payment must be fully documented and reported to the Program Lead.

## **Record Keeping**

All incidents of actual or suspected fraud, bribery, or corruption must be recorded, including actions taken, investigation outcomes, and any losses incurred. This information will inform the annual risk review and control effectiveness assessment.

## **Training and Awareness**

Think Education provides training to new employees as part of their onboarding process, focusing on the risks associated with fraud, bribery, and corruption and how to detect, prevent, and report such practices. Regular, relevant training is provided to existing employees to ensure ongoing awareness and compliance.

Think Education communicates its zero-tolerance approach to fraud, bribery, and corruption to all partners, beneficiaries, and contractors to promote transparency and accountability in all interactions and transactions.

This Anti-Fraud, Bribery, and Corruption Policy is effective immediately and applies to all Think Education operations and activities. Think Education reserves the right to review and update this policy as necessary to align with evolving legal requirements and best practices.