

## BOOKS2AFRICA ANTI-BRIBERY POLICY

### 1. Introduction

Books2Africa is committed to conducting all its activities with integrity, transparency, and accountability. This policy sets out our stance against bribery and corruption and provides guidelines for compliance with anti-bribery laws, particularly in relation to receiving payments from overseas institutions for the shipment of donated books and materials.

### 2. Scope

This policy applies to all Books2Africa staff, volunteers, directors, trustees, contractors, partners, and any third parties acting on behalf of the charity. It covers all activities, including procurement, financial transactions, and international partnerships.

### 3. Definition of Bribery

Bribery is the offering, promising, giving, requesting, or accepting anything of value with the intent to improperly influence a decision or gain an unfair advantage. Bribery can take many forms, including but not limited to:

- a. Cash payments, kickbacks, or facilitation payments.
- b. Gifts, hospitality, or travel expenses given with an improper purpose.
- c. Favors, employment opportunities, or other benefits offered in return for preferential treatment.

### 4. Prohibited Conduct

Books2Africa strictly prohibits:

- a. The offering, giving, soliciting, or receiving of bribes in any form.
- b. Making facilitation payments (small, unofficial payments made to expedite routine governance or administrative actions).
- c. Accepting gifts or hospitality that could influence business decisions.
- d. Engaging in any financial transaction with an overseas institution that suggests an intention to improperly influence Books2Africa's decisions or operations.

### 5. Receiving Payments from Overseas Institutions

- a. All payments received from overseas institutions and projects for the shipment of donated books and materials must be transparent, properly documented, and compliant with international anti-bribery laws.
- b. Payments should only be received through officially recognized banking channels.
- c. No Books2Africa representative may request or accept additional payments beyond the agreed charges for shipment or services.

- d. If an overseas institution offers an unsolicited donation or payment, it must be reported to the Board of Trustees for review and approval.

## 6. Due Diligence

- a. Books2Africa will conduct due diligence on all partners, corporate and large donors, and recipients to mitigate bribery risks.
- b. Contracts and agreements beyond the provision of donated books and educational resources, with overseas institutions must include anti-bribery clauses.
- c. Any concerns about potential bribery or corruption must be reported immediately to the Board of Trustees.

## 7. Reporting and Whistleblowing

- a. Employees, volunteers, and partners are encouraged to report any suspicions of bribery or corruption.
- b. Reports can be made confidentially to the Board of Trustees or through designated whistleblowing channels including our online contact form.
- c. Books2Africa prohibits retaliation against anyone who raises concerns in good faith.

## 8. Compliance and Monitoring

- a. All employees and volunteers must undergo training on anti-bribery practices.
- b. Books2Africa's financial transactions will be examined regularly to ensure compliance with this policy.
- c. The Board of Trustees will review and update this policy periodically to reflect best practices and legal requirements.

## 9. Consequences of Non-Compliance

- a. Any violation of this policy may result in disciplinary action, including termination of employment or contracts.
- b. Legal action may be taken against individuals or entities found to be involved in bribery.
- c. Books2Africa will cooperate fully with law enforcement authorities in any bribery investigations.

This policy is effective from the date of approval by the Board of Trustees and applies to all Books2Africa representatives and stakeholders.

**Approved by:** Books2Africa Board of Trustees

**Date:** 23 May 2019