

Anti-Bribery Policy

About us

The Adsum Foundation was established in 2008 to support communities in the developing world, with our sole focus within Madagascar. We deliver projects in the areas of education, WASH, sustainable livelihoods and health.

Purpose of our Anti-Bribery Policy

Adsum Foundation's reputation is a valuable asset that could be seriously damaged by allegations of bribery or corruption. As an organisation and staff, we must all work to avoid or prevent situations that may compromise this. It's not just Adsum Foundation's reputation that may be impacted by bribery and corruption – it is also those that we work with in Madagascar and the communities we seek to support.

Bribery

The organisation prohibits: the offering, the giving, the solicitation or the acceptance of any bribe, whether cash or other inducement; to or from: any person or company, wherever they are situated and whether they are a public official or body, private person or company; by: any individual employee, agent or other person acting on Adsum's behalf; in order to: gain any commercial, contractual or regulatory advantage for Adsum in a way which is unethical or in order: to gain any personal advantage pecuniary or otherwise for the individual or anyone connected with the individuals.

Four lines of defense

To meet obligations under the Anti-Bribery Act, the organisation will ensure the following:

- The Board of Trustees are committed to preventing bribery by persons associated with it. We will show this by actively disclosing all major instances and allegations to the Board.
- In addition, this policy states our intention to clearly state our position and define what action is needed as a result if bribery or corruption is suspected. We will inform the Northern Ireland Charity Commission of all major fraud, bribery.
- We will review our policies and procedures on an annual basis, to ensure that the risk of bribery, corruption and fraud is minimised. We will ensure segregation of duties as key in this.
- We encourage our employees and partners to be vigilant and to report any suspicion of bribery, as detailed below.

There is also considerable discussion about what constitutes a bribe. All unusual gifts (of whatever value) must be disclosed to the Director and a register will be kept. This includes Christmas gifts.

The policy does not prohibit the following practices:

- Normal and appropriate hospitality.
- The giving of a ceremonial gift at a festival or other special occasion.
- The offer of resources to assist the person or body to make a decision more efficiently, provided that they are supplied for that purpose only. **The key to the policy is – if in doubt ask.**

Investigation

The organisation will investigate instances of alleged bribery and will assist the police and other appropriate authorities in any resultant prosecution. We will also take firm action against any individual(s) involved in bribery or corruption.

Risk Assessment

The organisation believes the key to ensuring appropriate control over bribery is mitigation and prevention; therefore, we complete a risk review across the Charity to identify key risk areas – to inform our process, procedures and control and our training.

Obligations to Staff

The prevention, detection and reporting of bribery is the responsibility of all employees, trustees and volunteers throughout the organisation. Any employee, volunteer or partner who identifies or suspects that an act of bribery has occurred should report this immediately to the Director.

Reporting Procedure

Following best practice, the Reporting Officer ('RO') for the Adsum Foundation is the Director, Gavin Lonergan who will handle all responsibilities regarding this policy. Any suspicion should be reported in writing using a Suspicious Activity Report form. The Suspicious Activity Report form should be submitted to gavin@adsumfoundation.org

This is the Anti-Bribery Policy of the Adsum Foundation. It will be reviewed and updated, if required, at a minimum every three years; the next review is due June 2026.



Signed:

Position: Director



Signed:

Position: Grants & Partnerships Manager