

**ANTI-CORRUPTION POLICY AND PROCEDURES**

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| **Policy Owner** | BFO Director |
| **Compliance** | Mandatory |
| **Approved by** | BFO Director |
| **Document** | Anti-Corruption Policy and Procedures |
| **Effective Date** | February 2021 |
| **Last Revised** | February 2021 |
| **Next Revised** | March 2025 |
| **Contact** | BFO Director |

1. **WHO DOES THIS POLICY APPLY TO**

This policy applies to BFO and its subsidiaries, its directors, officers and employees worldwide (**"Employees"**) and any contractors, donors, or other third parties (**"NGO Partners"**) engaged to provide services on behalf of BFO.

The Policy is based on internationally accepted best practice guidelines and applies in all jurisdictions where BFO does business. The Policy must be adhered to in all BFO business dealings and transactions in all countries in which BFO, our Employees and NGO Partners operate. It applies to all transactions with domestic or foreign government / public officials and transactions with private companies or persons.

All of BFO’s Employees and NGO Partners are individually responsible for complying with the Policy and any breach may lead to disciplinary action, dismissal, or termination of contract.

The Policy will be communicated to all Employees within BFO and its subsidiaries, as well as relevant NGO Partners and Donors.

2. **THE BFO ANTI-CORRUPTION POLICY**

Policy aims:

* **Prevent BFO from the impacts of corruption.**
* **Prevent internal and external elements of corruption from impacting the work of BFO in communities; and**
* **Ensure the protection of children, employees, communities and donors.**

Policy outline:

* **BFO will not engage in bribery or corruption in any form, whether it involves individuals or companies in the public or private sector;**
* **BFO will not directly or indirectly accept, request, agree to receive, promise, offer or give a bribe;**
* **BFO will comply with all applicable anti-bribery and corruption laws in Australia and all other jurisdictions in which it operates; and**
* **BFO will not permit NGO Partners, Donors or any other third parties to pay bribes on its behalf.**

3. **DEFINITIONS**

**Corruption** is the misuse of public office or power for private gain.

**Bribery** is the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty.

4. **PROCEDURES**

1. Suspicious behaviour or incident is reported to BFO Director, Belinda Marshall.
2. Suspicious behaviour or conduct will be addressed within 72 hours of the issue being identified.
3. The BFO Advisory Committee will be notified of the situation for an opportunity to assess the incident and establish the basic facts.
4. The Advisory Committee will decide the outcome of the incident depending on its assessment:
5. Appropriate Behaviour- No case to pursue, informal discussion and further training
6. Serious poor practise/misconduct- Formal warning and further training
7. Possible Child abuse- Report to police and Government officials
8. BFO Director will inform the perpetrator of the outcome of the incident through an informal or formal discussion depending (written warning, termination of contract, termination of NGO partnership).

**Note**: All people involved in the incident, including the perpetrator will be offered supportive tools and resources that aim to guide away from corruptive actions and behaviours.

***If the violation is criminal…***

The advisory committee, along with BFO Director Belinda Marshall, will discuss the ramifications of pursuing legal action based on the incident and will also consider the appropriate action based on the history of human rights violations by authorities in certain areas. In ALL instances BFO will consider the terms of the Geneva convention, the United Nations policies on Human Rights and Amnesty international.

* Perpetrators will be contacted by Belinda Marshall and have the opportunity to discuss the incident at greater length.

* The individual or group of individuals will be put on immediate leave, or their involvement with the organisation will be terminated based on the nature of their violation.
* The correct Government/s will be contacted and informed of the incident.

5. **COMPLIANCE**

All BFO employees, NGO partnerships within its school projects and community programs, and donors.

6. **CONSEQUENCES OF BREACHING THIS POLICY**

If you fail to agree to and follow the Policy, you put yourself, your colleagues and BFO at risk, and your act or omission may result in disciplinary action, dismissal or termination of contract. In addition, you and BFO could be committing a serious criminal or civil offence, which may result in a large fine for BFO, confiscation of assets and imprisonment or a fine for you and anyone else involved.