



ANTI-CORRUPTION POLICY

Revised Version 2023

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1.0 BACKGROUND OVERVIEW

The present document establishes the anti-fraud and anti-corruption policy of Tanzania Mentors Action- TMA (hereinafter “the Organisation”). The policy was drawn up bearing in mind the framework within which the organization carries out its activities and as part of a strategy of continuous improvement and resource management based on strict principles of austerity, equity, discipline, and transparency, and the implementation of policies aimed at the exercise of good governance and ethical principles. The policy establishes the Organisation’s guidelines for the prevention, detection, and investigation of fraud, and specifies possible acts of corruption and other types of conduct that are unacceptable or inappropriate or forbidden under the Organisation’s rules and regulations, and the procedure for the adoption of corrective measures. Any act of fraud or corruption in TMA’s operations depletes funds and other resources intended for supporting its mission. Thus, as in other organizations, these acts can undermine its functioning and divert available resources. Moreover, fraudulent acts and other corrupt behaviour can seriously damage TMA’s reputation and jeopardize the trust that its counterparts and partners place in TMA. The continuous improvement of processes adds value to the work carried out and ensures that the organization has solid and secure underpinnings, thereby increasing the member countries’ confidence in TMA. All TMA personnel are the stewards of the resources entrusted to the Organisation. Hence, they are accountable for the proper, effective, and efficient use of those resources in achieving the intended outcomes of the Organisation’s projects in accordance with the strategic plan -SP II.

Corruption is recognized as a vice that is harmful to both private and public institutions all over the world. This is because it can lead to low productivity, loss of institution resources, low staff morale, tarnished institutional image as well as the flight of qualified staff among others. Consequently, TANZANIA MENTORS ACTION(TMA) acknowledges that corruption can occur in the organization and this anti-corruption and anti-bribery policy is a vital guide to enhance transparent and effective service delivery. TMA is committed to developing a culture that maintains zero tolerance for corruption and bribery in all its functional areas

1.1 Vision, Mission and Core Values







1.1.1 Our Vision





A healthy society that is productive to socio-economic development.

1.1.2 Our mission

To empower leaders, service providers and citizens across all levels to deliver demand-driven quality services through mentorship.

1.1.3 Core Values

	Excellence	We are committed to providing distinctive services and of high quality.
	Innovation	We are innovative in our designs and operations, using technology and modern ways of doing business to further satisfy the needs and expectations of the customer.
	Integrity	We value responsible character with impeccable levels of integrity for all individual members, office bearers, and staff of TMA, in and outside TMA programming.
	Commitment	We are fully committed to all our pledges and engagements.
	Respect	We accord due regard to the feelings, wishes, and rights of others.
	Transparency	We are transparent to our members, staff and stakeholders in all we do.

	Accountability	We are guided by the highest possible standards of internal and external accountability to all our stakeholders, and we comply with all statutory requirements.
	Equality	We believe that all human beings are equal in dignity and before the law.
	Gender Sensitive	We are sensitive to gender needs and understand that equality is not the same as equity.
	Diversity	We cherish and respect diversity in terms of culture, religion, political opinion, social origin and style of doing things provided the said diversity does not infringe on the law.

2.0 PURPOSE OF THE POLICY

The purpose of this Policy is to restate TMA’s commitment to full compliance by its representatives and members with Tanzanian anti-corruption and anti-bribery laws. This policy exists to set out the responsibilities of TMA and those who work for TMA in regard to observing and upholding the Organisation’s zero tolerance position on corruption and bribery.

To establish mechanisms designed to prevent, identify, and deal in an adequate, timely, and effective manner with acts or possible acts of fraud and corruption within TMA, and to permit the action to be taken to correct the situation immediately. To strengthen TMA’s ethical culture as an essential element for the establishment and implementation of mechanisms to prevent, identify and deal with acts of fraud and corruption that may occur within the Organisation. To ensure that the Member States, counterparts, and partners have an administration in which they can trust, and to prevent the Organisation’s reputation from being tarnished, by enforcing the directives and rules that prohibit the commission of acts of fraud and corruption within TMA.

Tanzania Mentors Action will ensure that:

- Financial information is accurate and reliable
- Policies, procedures, plans, rules, regulations, and laws are enforced
- Assets are protected against loss and theft
- Resources are used efficiently
- Goals and targets are achieved

3.0 SCOPE

TMA is committed to preventing, detecting, investigating, correcting and, where applicable, punishing all acts of fraud and corruption committed against the organization, whether they are committed by members of its own staff, employees of other institutions or third parties. TMA has a policy of zero tolerance for acts of fraud and corruption, meaning that all such incidents are to be reported and will be investigated in accordance with organizational policies. Furthermore, it endeavor's to raise awareness of fraud and corruption risks, implement controls aimed at preventing them, and establish and maintain procedures for their detection and the enforcement of this policy. This policy applies, without exception, to all activities and operations of TMA, including any irregularity, or suspicion of irregularity, involving staff members, as well as suppliers, consultants, contractors, and/or any other party that has a working or contractual relationship with TMA.

4.0 THE POLICY

TMA is responsible for the prevention and detection of fraud, acts of corruption, and other irregularities. Fraud is defined as an act in which a person, institution or entity behaves illegally or incorrectly, according to the parameters of this policy, harming the entity or person against whom the fraud is committed, to the damage of the Organisation or third parties.

Corruption is an action that transgresses legal and ethical standards; it also involves the complicit exchange of private resources and the abuse of authority; nepotism and favoritism may also be considered corruption.

Neither fraud nor corruption is restricted to monetary or material gain; these acts can also include intangible benefits such as status or exchange of information, creating benefits for specific individuals or interest groups. All TMA staff & members should be familiar with the types of irregularities that may occur within their area of responsibility and be attentive to any sign of failure to comply with the regulations. Any irregularity that is detected or suspicion that is aroused should be reported immediately to the Ethics and Audit Committee, which, in keeping with the Policy on the Protection of Whistle-blowers and Witnesses, will objectively examine and analyze the case; determine an approach, disciplinary measures and corresponding actions; and conduct an investigation involving the gathering of information, analyses, conclusions, implementation and follow up. Any irregularities detected by the Internal Audit Unit shall be reported immediately and directly to the Chief Executive Officer, who will decide whether to request the intervention of the Ethics and Audit Committee for the pertinent action to be taken.

Anti-Corruption and **Anti-Bribery** Laws neither the organization nor any of its subsidiaries nor any director, officer, or employee of the organization or any of its subsidiaries, nor to the knowledge of the organization any agent, affiliate or other person acting on behalf of the organization or any of its subsidiaries has, in the course of its actions for, or on behalf of, the organization or any of its subsidiaries

- i. used any corporate funds for any unlawful contribution, gift, entertainment or other unlawful expenses relating to political activity;
- ii. made or taken any action in furtherance of an offer, promise, or authorization of any direct or indirect unlawful payment or benefit to any foreign or domestic government official or employee, including of any government-owned or controlled entity or public international organization, or any political party, party official, or candidate for political office;
- iii. violated or is in violation of any provision of the country Preventing and Combating Corruption Act (**PCCA**) of 2007, which applies in conjunction with other related laws including the Anti-money laundering act 2006, the economic and organized crimes control act Cap 20 R.E 2002, the Public Procurement Act 2011, the Public Finance Act 2004

5.0 ACTIONS THAT CONSTITUTE FRAUD AND CORRUPTION

5.1 FRAUD

Terms such as embezzlement and misappropriation, as well as other irregularities, refer, but are not limited, to:

- Any dishonest or fraudulent act
- Misappropriation of funds, other assets, or supplies
- Speculation based on knowledge of privileged information concerning the institution's activities
- Acceptance or seeking of material inducements from contractors, suppliers or individuals who provide services and materials to the Organisation
- Destruction, elimination, or inappropriate use of records, furnishings, accessories, equipment, information; and/or
- Any related or similar irregularity

5.2 CORRUPTION

A corrupt practice is one that involves directly or indirectly offering, giving, receiving, soliciting or promising something of value such as money, gifts or a private advantage such as an incentive or reward, in exchange for doing something illegal, for improperly influencing the actions of another party, or for abusing a position of power or authority; a Tanzania Mentors Action breach of trust or any other improper act may also constitute corruption. Acts of corruption may refer, but are not limited to:

- Participating in any form of bribery, including offering, promising, giving, accepting or soliciting payments to gain any improper business advantage.
- Promising, giving or soliciting contributions to political parties and organizations or individuals involved in politics as a pretext for bribery.
- Promising, giving or soliciting charitable contributions or participating in charitable sponsorships as a pretext for bribery.

- Offering or accepting gifts, entertainment, or hospitality as a pretext for bribery.
- Making a payment to a government agent and/or public official to facilitate a routine activity that, while not prohibited, should not be used as a pretext for bribery.

6.0 OTHER IRREGULARITIES THAT DO NOT CONSTITUTE FRAUD AND CORRUPTION

Situations involving irregularities relating to the moral or ethical conduct or behaviour of a staff member are to be resolved by the Ethics and Audit Committee. Should there be any doubt as to whether an action constitutes fraud or corruption, the Ethics and Audit Committee will provide guidance, requesting support advice from the Legal, International Affairs and Protocol Unit, as necessary.

7.0 REPORTING CHANNELS

TMA has established two mechanisms to receive and respond to reports, which will allow persons to submit and channel their reports or complaints regarding the issues dealt with in this Policy in a confidential manner, namely:

- The official Internet site: info@tma.or.tz in the REPORTING/ COMPLAINTS section and/or
- One can report through the whistle blower channel found on TMA's website www.tma.or.tz

All reports, complaints, investigations, and information in reference to the reported matter shall be examined and analysed objectively by the Organisation's Ethics and Audit Committee, which will determine an approach, disciplinary measures and corresponding actions. If the complainant so requests, he or she will be informed in a timely manner of the processing of the complaint and, if appropriate, of the outcome of the investigation. To this end, the complainant must provide an e-mail address.

8.0 INTERNAL AUDIT UNIT

It is the responsibility of the Internal Audit Unit to provide recommendations on risk prevention. Therefore, to contribute to the fulfilment of this Policy, the Internal Audit Unit shall:

- Draw up an auditing plan that includes monitoring the controls identified for mitigating the risk of fraud and corruption and verifying their sufficiency and effectiveness.
- Communicate to the Chief Executive Officer of the Organisation any shortcomings identified in their audits related to possible frauds, acts of corruption or inherent risks.

9.0 COMMUNICATION AND TRAINING

To strengthen the prevention of the risk of fraud and corruption within the organization, efforts shall be made to ensure that all staff members are informed about this Policy, the Code of Ethics, and the Policy on the Protection of whistle blowers and Witnesses. Additionally, information about ethics-related issues and compliance with the organization's rules and regulations, particularly those related to risks, shall be provided to new employees during their onboarding process.

10 SANCTIONS

If a member of the TMA staff or a third party is found to have engaged in an act of fraud or corruption, either alone or in concert with another person, the Organization will impose the appropriate sanctions in accordance with its laws and regulations.

11 RESPONSIBILITY FOR THE POLICY

The administration, review, interpretation, and application of this policy are the responsibility of the Ethics and Audit Committee, which shall also coordinate the necessary actions while informing the Chief Executive Officer so that, in accordance with the authority granted to him and in accordance with organizational regulations, he/she may choose the course of action to be taken or the sanctions to be applied. When necessary, the policy will be reviewed and modified.

12 APPENDICES

ACKNOWLEDGMENT FORM

Staff policy Declaration Form for Tanzania Mentors Action, Dodoma, PO Box 4278 As a member/ mentor/staff of Tanzania Mentors Action,

II agree that I have read and understood the information set out in TMA's anti-corruption policy. If I violate it, appropriate action will be taken against me.

Employee/Mentor/Member

Chief Executive Officer