



THE MULTIFAITH HOUSING INITIATIVE

ANTI-BRIBERY and CORRUPTION POLICY

Passed by the Board of Directors on 29 May, 2014

INTRODUCTION

This policy sets out the general rules and principles to which we adhere in order to prevent acts of bribery and corrupt practices. It will be communicated to all our employees, property management service providers, Board members, Committee member, volunteers as well as relevant business partners and other individuals and entities that the MultifaitH Housing Initiative (MHI) deals with in the ordinary course of its business.

Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. For the purposes of this policy, whether the payee or recipient of the act of bribery or corruption works in the public or private sector is irrelevant. Further, it does not matter whether the act of bribery is committed before or after the tendering of a contract or the completion of administrative tasks.

Definitions

Bribery: is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for an action which is illegal, unethical or a breach of trust.

Corruption: is the misuse of public office or power for private gain; or misuse of private power in relation to business outside the realm of government. Types of corrupt behaviour include, but are not limited to:

1. **Swindling:** money or property is obtained by fraud or deceit;
2. **Laundering:** illegally obtained money or investments are transferred to an outside party to conceal the true source
3. **Extortion:** undue or illegal power is obtained from a person through the use of force or intimidation

Fraud: An act or omission, made with the intent of making a financial gain, or causing a financial loss, or exposing another to the risk of a financial loss, in which a person:

- dishonestly makes a false representation; or
- dishonestly fails to disclose information which he or she is under a legal duty to disclose; or
- occupies a position in which he or she is expected to safeguard, or not act against, the interests of another person and;
- dishonestly abuses that position; and
- intends, by means of that abuse of that position to make a gain for himself or herself or another, or to cause loss to another or to expose another to the risk of loss.

Improper: Means where the person concerned

- 1) fails to perform a function or activity in good faith, impartially or in accordance with a position of trust; or
- 2) does not perform the function at all.

Application of the Policy

1. This policy applies to all "**staff**", meaning all individuals working within the Multifaith Housing Initiative at all levels and grades, including the Executive Director, managers, employees (whether permanent, fixed term or temporary), contracted agencies and staff, interns or any other person working in any context within the organization.
2. This policy also applies to "**associated persons**", meaning any individual or organization performing services for and on behalf of MHI, which may include the Board of Directors, committee chairs and members, other volunteers, partners in collaborative working arrangements and joint ventures, and suppliers.

Statement of Policy

1. As an overriding principle, all employees and associated persons should observe a commitment to integrity in all aspects of their conduct.
2. Under no circumstances will MHI knowingly be involved with companies or individuals who offer or give bribes or participate in any other form of corrupt behaviour, either in a direct or indirect manner.
3. No member of staff or associated person shall seek a financial or other advantage for MHI through bribery.
4. No member of staff or associated person shall offer, promise, give, request, agree to receive, or accept a bribe for any purpose.
5. MHI prohibits any form of fraud within its operations, and no MHI staff or associated persons may engage in any form of fraud with regard to activity carried out within or on behalf of the organization.
6. MHI staff who suspect that bribery or fraud has occurred are required to report such instances to the President of the Board and the Executive Director. The matter will be appropriately investigated, recorded, and reported. The Board of Directors shall be responsible under this Policy for monitoring and recording instances of bribery or fraud and reporting all issues to the Executive Committee.

Policy Implementation

1. Executive Monitoring and Review

The Executive Committee will review the implementation of this policy in respect to its suitability, adequacy and effectiveness and make improvements as appropriate. The Committee will periodically report the results of this process to the Board of Directors.

2. Internal Policy Awareness

- a) **Acknowledgement of Receipt:** All members of the Board of Directors and all officers, employees, and contracted staff must acknowledge receipt of this Anti-Bribery and Corruption Policy and their understanding of its contents by signing the Acknowledgement of Receipt (Appendix 1).
- b) **Policy Literature:** Policy literature on this topic should be conveyed to all employees, and associated persons when beneficial or required on an 'as required' basis.

3. Complaints/Suspicions of Bribery and Corruption

Reporting of suspicious or suspected bribery or corruption will be reported to the Executive Director and/or the President of the Board of Directors. Complainants will be required to submit written allegations, providing a description of the nature of the complaint, names of individuals involved, and the places and dates in which actions were alleged to have taken place.

The Executive Director, President of the Board, as well as legal counsel, where appropriate, will investigate the complaint allegation or designate a third party to do so. On completion of the investigation, any subsequent action required, management or legal counsel will advise the Board of Directors of the outcome.

4. Financial Transactions

MHI will ensure that all financial accounting relating to contract transactions are properly and fairly recorded and financial records are subject to audit by a third party auditor.

Consequences of Policy Non-Compliance

Should it be concluded that an employee or associated person has acted in non-compliance with this Policy, that individual will be subject to appropriate disciplinary action which may include discharge, contract termination, criminal prosecution or civil liability.

Confidentiality

All information relating to bribery and corruption investigations should be treated as confidential and disclosed to responsible parties on a “need to know basis”. Given the sensitivity of the information, its sources, and the severity of an accusation leading to a penalty being imposed for perpetrating bribery and corruption, all MHI employees and associated persons need to respect the confidentiality of information, accusations, and conclusions derived from related investigations.

Appendix 1: Acknowledgement of Receipt

All members of the Board of Directors, employees and contracted agents of MHI must acknowledge receipt of this Anti-Bribery and Corruption Policy and their understanding of its contents

ACKNOWLEDGEMENT OF RECEIPT

I, (insert name in Capital letters) _____
acknowledge that I have received a copy of the Multifaith Housing Initiative’s Anti-Bribery and Corruption Policy.

I acknowledge having read this Policy, that I understand its terms and contents, and that I am bound by the provisions therein.

Signature: _____

Date: _____