



Anti-Corruption Policy

1. PRINCIPLES

JDI has a well-established reputation for carrying out her operations in an ethical and honest way. This reputation is built on our organisation's value of integrity, which is a major, underlying theme found throughout her core values.

JDI strives to serve the public as a transparent organisation, and is committed to doing so without the use of bribery or other corrupt practices to obtain an advantage.

JDI will apply a "zero tolerance" approach to acts of bribery and corruption by any of our employees, officials or third-party representatives. The JDI Administrative team will have the primary responsibility for implementing this policy.

Any breach of this policy will be regarded as a serious matter by JDI and will result in disciplinary action that may be as serious as termination of employment or contract.

2. SCOPE

The policy applies to JDI and anyone related to her such as, her volunteers, interns, staff, members of the Board of Trustees and partners.

3. DEFINITION OF CORRUPTION AND BRIBERY WITHIN JDI

Corruption is the misuse of office or power or influence for private gain, in a way that hampers public interest. Corruption includes but is not limited to bribery, embezzlement, fraud, extortion, favouritism and improper political contribution.

In the case of bribery, it takes on many different shapes and forms, but typically there will be a "quid pro quo" – meaning that both parties, or a party's designate, will benefit. A bribe could be:

- The direct or indirect promise, offering, or authorization, of anything of value (whether the value is material or not);
- The offer or receipt of any, loan, fee, reward or other advantage; or
- The giving of aid, donations or any other form of value, designed to exert improper influence.

Acts of bribery are designed to influence individuals to act dishonestly in the performance or discharge of their duty. For the purposes of this policy, whether the target of the act of bribery works in the public or private sector is irrelevant.

4. BRIBERY AND CORRUPTION PREVENTION

A. Accurate Books and Record-Keeping: JDI Administrative Team must ensure that books, records and overall financial reporting must also be transparent. That is, they must accurately reflect each and all underlying transactions. There should also be provisions to cater for risks associated with corruption-prone areas such as bank runs, procurement etc. These provisions shall include but may not be limited to multiple account signatories, establishment of

procurement committees, more than one staff member making bank runs where the amount exceeds a certain figure etc.

B. Effective Monitoring and Control: JDI Administrative team must take the necessary steps to maintain an effective system of internal control and monitoring to prevent bribery and corruption. This includes education and training of employees as well as orientation on this policy.

5. KEY RISK AREAS FOR BRIBERY AND CORRUPTION

A. Gifts, Entertainment and Hospitality

Gifts, entertainment and hospitality include the receipt or offer of gifts, meals or tokens of appreciation and gratitude, or invitations to events, functions, or other social gatherings, in connection with matters related to our organisation. These activities are acceptable provided they:

- fall within reasonable bounds of value and occurrence as defined by JDI's policies
- do not influence, or are not perceived to influence, objective organisation's judgement; and
- are not prohibited or limited by applicable laws or applicable organisation codes.

JDI or anyone related to her must not accept gifts or entertainment where to do so might influence, or be perceived to influence, objective organisational judgement.

As a general rule, JDI and anyone related to her should not provide any gifts to, or receive them from, government officials. With the prior advice of JDI's legal consultant, rare exceptions may be permitted where a gift is an important local/cultural custom, and any such gift is permitted under applicable law and is of nominal value.

5.1. How to evaluate what is "acceptable"

First, each JDI Person must take a step back and ask the following when giving or receiving any gift, entertainment or hospitality:

- What is the intent – is it to build a relationship or is it something else?
- How would this look if these details were reported on the front of a newspaper?
- What if the situation were to be reversed – would there be a double standard?

If a JDI Person finds it difficult to positively answer any of the above questions, there is a risk involved that the gift, entertainment or hospitality could be, or could appear to be, improper and could potentially damage JDI's reputation and business. The action could well be unlawful.

Although no two situations are the same, the following guidance should be considered:

Never acceptable

Circumstances which are never permissible include examples that involve:

- A "quid pro quo" (a benefit or advantage offered for something in return);
- Gifts in the form of cash/or cash equivalent vouchers;
- Entertainment of a sexual or similarly inappropriate nature; or

- Making incomplete, false or inaccurate entries in JDI's books and records.

Sometimes acceptable

Activities that may be acceptable depending upon the particular jurisdiction and the particular person JDI does do business with include:

- Modest/occasional meals;
- Occasional attendance at ordinary sports, theatre and other cultural events; or
- Gifts of nominal value, such as pens, or small/low value promotional items.

If an example does not fall under the above categories, please in the first instance seek guidance from your line manager. Generally, such instances would not be permissible without prior approval.

Political Donations, Charitable Donations and Sponsorships

Neither JDI nor anyone related to JDI as aforementioned, may make any direct or indirect contribution to any political party, organisation or individual engaged in politics as a way of obtaining an improper advantage in JDI's activities. JDI must ensure that any charitable contribution or sponsorship is not being used as a subterfuge for bribery.

All charitable donations and sponsorships must be made in accordance with applicable local laws and regulations and in accordance with JDI's authorisations and delegations' framework.

6. USE OF THIRD-PARTY REPRESENTATIVES

For the purposes of this policy, the term "third-party" includes anyone who is not a JDI employee, volunteer or JDI official (e.g. Board Member). As such, a "third-party" includes agents, vendors, distributors, consultants and partners. Risk can be identified where a third-party conducts activity on JDI's behalf or distributes JDI's services so, that the result of their actions can be seen as benefiting JDI. **Third-parties who act on JDI's behalf or distribute JDI's services must operate at all times in accordance with JDI's Code of Conduct and this policy.** The JDI Administrative team is responsible for the evaluation of each third-party relationship and assessing risk. Where potential risk regarding a third-party arrangement has been identified, the team must:

- Evaluate the background, experience, and reputation of the third-party;
- Understand the services to be provided, and methods of compensation and payment;
- Evaluate the rationale for engaging the third-party;
- Take reasonable steps to monitor the transactions of the third party;
- Ensure there is a written agreement in place which acknowledges the third-party's understanding of and compliance with JDI's Code of Conduct and this policy; and
- Establish a process to conduct regular reviews of the third party's ongoing understanding and compliance with JDI's Code of Conduct and this policy.

7. HOW TO RAISE A CONCERN

All JDI staff, volunteers, interns and members of the Board have a responsibility to help detect, prevent and report instances not only of bribery and corruption, but also of any other suspicious activity or wrongdoing in connection with JDI's business.

JDI is absolutely committed to ensuring that all JDI Persons have a safe, reliable, and confidential way of reporting any suspicious activity.

JDI has established and will continue to maintain multiple channels that facilitate the reporting of any suspected incidence of bribery or corruption. A Person may report the issue/concern to their Line Manager in the first instance. If for some reason it is not possible to speak to their Line Manager, then the issue/concern should be reported to the Chief Operating Officer.

If a JDI Person is not comfortable with speaking directly to a colleague or anyone mentioned above, JDI has a reporting or "whistleblower" facility, which is a box that only the Chief Executive Officer and Chairman of the Board of Trustees have access to. Therein, anonymous reports of foul play may be dropped with details, for investigation.

Similarly, periodic internal evaluation forms are to be given to all members of staff twice a year. This form is submitted anonymously, and is a tool to check all forms of misconduct that any member of staff may have witnessed.

In cases where foul play is detected, a committee constituting select members of the Board of Trustees, the Chief Executive Officer and select members of staff shall be established to thoroughly investigate the matter. In addition to any internal procedures, this includes the referral to appropriate government enforcement agencies. Any questions about these procedures should be directed to JDI's legal consultant.