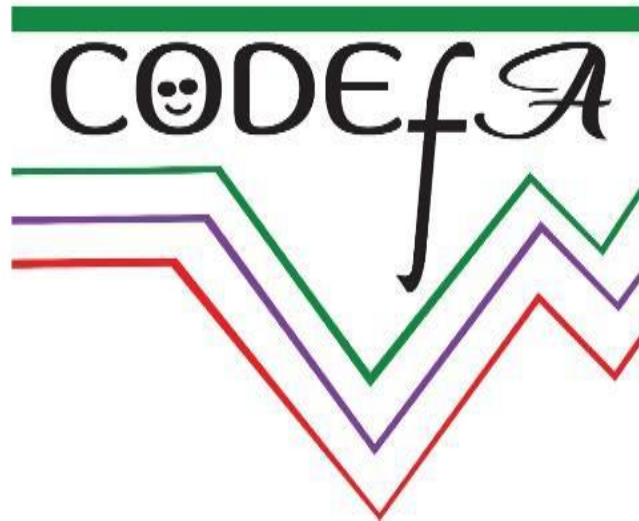


COMMUNITY DEVELOPMENT FOR ALL



ANTI-BRIBERY/CORRUPTION POLICY

1. PURPOSE

This Anti-Bribery Policy establishes the principles and procedures that govern the prevention, detection, and reporting of bribery and corruption in all activities undertaken by COMMUNITY DEVELOPMENT FOR ALL. The policy aligns with our commitment to integrity, transparency, and accountability in promoting sustainable development and empowering communities.

2. PRINCIPLES AND RULES

COMMUNITY DEVELOPMENT FOR ALL is committed to developing a corruption-free environment in all interactions with its partners, employees, and other stakeholders. Therefore, the following rules and principles guide the implementation of this policy.

2.1 BASIC RULES

COMMUNITY DEVELOPMENT FOR ALL does not distinguish between public officials and private persons regarding bribery: bribery is not tolerated, regardless of the recipient's status.

3. SCOPE

This policy applies to all:

- Employees, directors, volunteers, interns, and consultants.
- Partner organizations, contractors, suppliers, and other third parties engaged with COMMUNITY DEVELOPMENT FOR ALL it covers all interactions, including those with public officials, private sector representatives, donors, and community stakeholders.

4. DEFINITIONS

Bribery: Offering, promising, giving, requesting, or accepting any undue advantage, whether financial or otherwise, to influence the performance of a duty or decision.

Examples include:

- Offering or accepting money or gifts to secure a contract or funding.
- Making facilitation payments to expedite routine actions.
- Providing excessive hospitality to influence a decision.

Public officials:

- Any person acting in an official capacity for or on behalf of a government or a government department, government agency, or of a public international organization
- Politicians and candidates for a political position
- Any elected or appointed officer or employee of a government or government

department, government agency, or a company owned or partially owned by a government.

- Politicians and candidates for a political position

Lobbying: Lobbying should not be misused for corrupt or illegal purposes or improperly influencing decisions. Lobbying should be conducted based on transparency, honesty, and integrity.

POLICY STATEMENT

- CODEFA will ensure employees, Board members, volunteers, and third parties that engage with CODEFA are made aware corruption Policy.
- No CODEFA Person, or any third party acting on behalf of CODEFA or dealing with CODEFA, shall offer to pay a bribe nor shall they solicit the payment of a bribe or accept a bribe in conjunction with any aspect of CODEFA's activities.
- CODEFA will perform a corruption risk assessment to inform the development of a corruption-aware workforce and foster an organizational culture in which corruption is never acceptable.
- Corruption on the part of any CODEFA employee, board member, or volunteer Or any third party in their engagement with CODEFA is prohibited.
- CODEFA will develop a corruption response plan documenting how incidents will be investigated, reported, and closed.
- CODEFA will immediately report all instances of suspected actual corruption to the Board of Directors which is responsible and accountable for ensuring the incident is investigated appropriately. In some cases where the board of directors commits an allegation, the report should be directed to the chairperson of the board/ and the chairperson of the annual general meeting.
- CODEFA will ensure employees, Board members, volunteers, and third parties that engage with CODEFA are made aware corruption Policy.
- If employees who commit corruption fail to report knowledge of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Board Members who fail to comply with this policy are subject to removal. Third parties who fail to comply with this policy will have their agreements and/or contracts with CODEFA terminated. CODEFA may also seek restitution or prosecution or other legal remedies.



Signed and Adopt

Astronaut Bagile - Board Chairperson

10/4/2023