



## ANTI-CORRUPTION POLICY

At Altus Sport we are deeply committed to doing the right thing, the right way at the right time.

Our code of ethics and behaviours outlines the standards and behaviours that Altus Sport upholds as an organisation.

Today, this is more important than ever, not only because of the strict new rules brought in by donors in order to safeguard international and public funds, but because as we grow we must pay even closer attention to International laws and standards very specific to anti-fraud and anti-corruption.

**At Altus Sport, we operate a zero tolerance approach to the making or receiving of bribes or corrupt payments, in any form.**

This type of conduct is absolutely prohibited whether committed by staff members, employees, coordinators, youth leaders, coaches or anyone else acting on the Organisation's behalf.

The Altus Sport Board of Directors consider bribery and corruption risks as a standing item on their agenda and updated on this topic on a regular basis as well being provided with ad hoc updates when necessary.

Altus Sport has signed these policies with their various funders, and is committed in upholding the standards and rules as set out in the policies.

This policy sets out what is and is not acceptable in general terms, but if you are in any doubt as to whether any conduct could amount to local and international definitions of bribery or fraud, the matter should be referred to me who will take it to the Board of Directors.

It is absolutely essential and required that you read carefully and comply completely with this policy.

Finally, we are requesting that you then sign the clause at the end of this document. I thank you in advance for taking this matter as seriously as we do.

Gert Potgieter  
Director  
Altus Sport.

## ANTI-FRAUD AND ANTI-CORRUPTION POLICY

### 1 ABOUT THIS POLICY

This policy sets out the requirements and recommendations to help prevent fraud and corruption in all its forms where Altus Sport funds, provides assets or where Altus Sport's interests are involved.

**A bribe** may include any payment, benefit or gift offered or given with the purpose of influencing a decision or outcome. The bribe may not always be of a large value. It could be a small lunch, gift or an invitation to an event.

**A fraud** is a corrupt practice, a wrongful or criminal deception intended to result in financial or personal gain. A fraud implies a person, action or thing intended to deceive others, typically by unjustifiably claiming or being credited with accomplishments or qualities.

### 2 WHO MUST COMPLY?

The Altus Sport **Anti-Fraud and Anti-Corruption policy is mandatory** for all Altus Sport **employees, staff members, consultants, volunteers, coaches, youth leaders, coordinators implementing schools or any other programme partners** working for or on the organisation's behalf anywhere in the country.

The prevention, detection and reporting of fraud or corruption in any form is the responsibility of all individuals related to Altus Sport, respective of their status or position. Altus Sport have the appropriate confidential channels for reporting any suspicion of fraud or corruption.

Any failure to comply with this policy will be treated seriously and may result in disciplinary, legal action or termination of contract.

### 3 HOW DO YOU COMPLY?

You, representing Altus Sport, must read carefully and abide by the terms of this policy. **You also are required to provide written confirmation that you will comply with this policy, by signing the pertinent clause at the end of this policy.**

### 4 WHAT HAPPENS IF YOU DO NOT COMPLY?

Any act of fraud or corruption, in whatever form is unacceptable. We will take disciplinary action against anyone who fails to comply with the Anti-Fraud and Anti-Corruption policy up to and including dismissal. Failure to comply with this policy may also leave you open to a criminal prosecution.

### 5 WHAT YOU CAN'T DO

#### ***Prohibited conduct***

The following conduct is absolutely prohibited under this policy:

- making or accepting a bribe in any form or time;
- making unofficial payments to any other organisation / person
- seeking payments of any form from the participants / coaches / youth leaders
- providing of any incorrect information on activities / sessions
- paying any third party for the purposes of being a 'fixer' to 'open doors' and make connections of any kind.

## REPORTING FRAUD AND CORRUPTION

### SPEAKING UP – REPORTING FRAUD AND CORRUPTION

**Any suspicions of fraud or corruption should be reported immediately.**

Altus Sport aims to conduct its operations with the highest standards of ethics, honesty and integrity, and recognises that you have an important role to play in maintaining this aim.

Anyone concerned about a potential incident of bribery or fraud, any form of malpractice, improper action, or wrongdoing by the its employees, volunteers or other stakeholders are strongly encouraged to report the matter to Altus Sport.

## CONCLUSION

We believe it is essential to create an environment in which you feel able to raise any matters of concern internally without fear of disciplinary action being taken against you, that you will be taken seriously, and that the matters will be investigated appropriately and as far as practicable be kept confidential.

Altus Sport believes that any employee, volunteer or any programme stakeholder with knowledge of fraud or corruption in any form should not remain silent. We take all matters of malpractice, improper action or wrongdoing very seriously and **you are strongly encouraged to raise incidents or behaviours that are not in accordance with the policy**, by following the procedure set out below:

- In the first instance, do not approach or accuse any individuals directly, you should consider raising your concerns to the Programme Manager. He/she has a responsibility to listen and respond to any matter that is of concern to you. Concerns can be raised verbally or in writing. The Programme Manager will determine whether he/she is able to investigate the concern directly, keeping Management updated and informed of progress and its conclusion.
- If you feel that you cannot raise your concern with the Programme Manager, for whatever reason, you should contact the executive management, who will consider the matter.
- The organisation recognises that there may be some cases where no wrongdoing is found through internal procedures. Protection will be given and no disciplinary action taken if the disclosure is reasonable, made in good faith and the information believed to be true.

## ANTI-FRAUD AND ANTI-CORRUPTION – AGREEMENT CLAUSE

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name:

Position:

Organisation: