



Anti-Bribery and Corruption Policy

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Introduction and scope

This Anti-Bribery and Corruption Policy outlines Lyra’s approach to the prevention and control of bribery, corruption and fraud, including the investigation procedures that will be followed if there are suspicions of bribery, corrupt or fraudulent practices. Lyra’s Anti-Bribery and Corruption Policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, suppliers, casual workers, agents or any other person associated with the organization, wherever located (collectively referred to as “*Lyra parties*” in this policy). Lyra does not allow any partner, supplier, sub-contractor, agent or any individual engaged by Lyra to behave in a dishonest manner while carrying out Lyra’s work.

Purpose:

Lyra has zero tolerance for corrupt activities in any form, including bribery, facilitation payments and any kind of influence, whether committed by Lyra employees, or third parties acting for or on behalf of Lyra. Lyra commits to comply with applicable country specific laws and regulations on anti-bribery and corruption where we operate. Lyra requires all employees, contractors, consultants, and all who we work with to comply with the same laws and to this policy.

Bribery, corruption and fraud are criminal offences and are punishable, including imprisonment and unlimited fines for individuals. Non-compliance with this policy may result in disciplinary action being taken which may lead to termination of employment, and/or to the termination of a third-party contract.

Definitions

Bribery: A bribe means offering, promising, giving, authorizing, requesting or receiving financial or non financial advantage or anything of value.

Corruption: Corruption is the abuse of entrusted power for private gain

Fraud: Fraud is any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and or the perpetrator achieving a gain

Lyra's commitment to tackling and preventing Bribery and Corruption

Lyra's directors, trustees, employee, representative and consultants are committed to perform their work without bribery, corruption or fraud. And therefore, they will not offer, pay, promise or authorize to pay money, gifts or anything of value, directly or indirectly, whether in cash or in kind, to or for the benefit of any party in order to improperly secure or retain business or to obtain, retain or secure an improper advantage in the conduct activity with Lyra.

It is not acceptable to:

- Give, promise to give or offer a payment, gifts or hospitality with the intention of influencing, inducing or rewarding improper performance.
- Give, promise to give, or offer a payment, gift or hospitality to a government official, contractor, supplier, agent or representative to "facilitate" or expedite a routine procedure (where the payment is not a legitimate payment to local written law)
- Accept payment from a third party that you know, or suspect is offered with expectation that it will obtain an advantage for them which will be obtained through improper performance by you or Lyra;
- Accept a gift or hospitality from a third party if you know or suspect it is offered or provided with the intention of influencing improper performance by Lyra in return, and
- Threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concern under this policy.

Roles and Responsibilities:

Board level

Lyra Board of Trustees in the UK and Tanzania hold the responsibility to receive and review all reported issues on bribery, corruption and/or fraud, and how they were tackled. The Boards have the mandate to recommend any updates to further improve this Policy. The Boards hold the respective Executive Director of Lyra (UK) and National Director of Lyra (TZ) accountable for ensuring dissemination, implementation and adherence of the policy.

Director level

Lyra Executive Director (UK) and Lyra National Director (Tanzania), are the primary responsible people to oversee dissemination, implementation and adherence of this policy and reporting to the UK and Tanzania Boards.

Personnel

All personnel of Lyra will

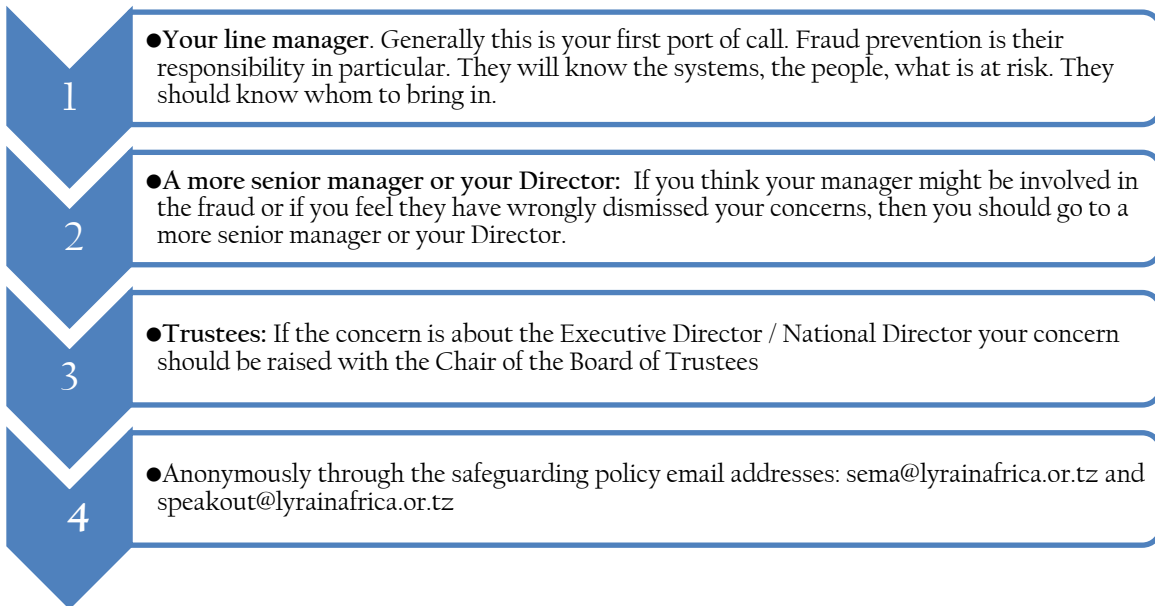
- Comply with this policy
- Take appropriate measures to detect and report any suspicions of fraudulent and corrupt practices through the appropriate channels
- All must sign to accept Lyra's Anti-Corruption and Bribery policy.

Reporting of fraudulent or corrupt practices

Fraud or corruption may be uncovered in a variety of ways, from your own observations, someone from inside or outside blowing the whistle, ongoing controls throwing up a discrepancy, internal or external audit discovering a problem, or external regulators and inspectors finding something.

Things to do:	Things not to do:	Some things to remember:
<p>Stay calm – remember you are a witness not a complainant</p> <p>Write down your concerns immediately – make a note of all relevant details such as what was said in phone or other conversations, the date, the time and the names of anyone involved</p> <p>Consider the possible risks and outcomes of any action you take</p> <p>Make sure your suspicion is supported by facts, don't just allege</p>	<p>Do not become a private detective and personally conduct an investigation or interviews</p> <p>Do not approach the person involved (this may lead to him/her destroying evidence)</p> <p>Do not discuss your suspicions or case facts with anyone other than those persons referred to below unless specifically asked to do so by them</p> <p>Do not use the process to pursue a personal grievance</p>	<p>You may be mistaken or there may be an innocent or good explanation – this will come out in the investigation The process may be complex and you may not be thanked immediately and the situation may lead to a period of disquiet or distrust in the organisation despite your having acted in good faith</p>

Lyra parties who have knowledge of an occurrence of fraud or a corrupt act or has reason to suspect that a fraudulent or corrupt act has occurred, have a duty to **immediately report**. The following reporting lines are to be used regardless of the potential magnitude of the fraud or corrupt act:



Lyra parties who fail to report any suspicions of fraudulent and corrupt practices, may be held accountable as directly or indirectly tolerating or condoning improper activity.

Investigation

Upon receiving any information about suspected instances of bribery, fraud or corruption from Lyra parties, the Senior management team will convene relevant parties and put a response plan in place within 48 hours of receiving the information.

If the incident is raised in Tanzania, a case investigation team will be set-up by the Board or Senior Management to investigate and provide a report on the evidence gathered within 21 days, or as soon as practicable thereafter, to the National Director of Lyra (TZ), who will decide, within 7 days, whether any further action is required. The National Director, together with the Lyra (UK) Executive Director, shall be responsible for the introduction of any change in Lyra's procedures, or action against any individual within the following 7 days. The Lyra (UK) Executive Director also has responsibility for reporting any circumstances deemed necessary to donors. Any investigation will be conducted impartially, fairly and thoroughly.

Where any complaint is wholly or partially upheld, the National Director of Lyra (TZ) shall provide a report on this, and actions taken as a result, to the next meeting of the Tanzanian Board.

In the event that any complaint or suspicion should rest on the Lyra (TZ) National Director, a review would be made by the Executive Director of Lyra (UK) in the first instance, reporting to the UK Board Chair immediately for attention to the Lyra (UK) Board. In the event that any complaint or suspicion should rest on the Executive Director of Lyra (UK), then the initial approach may be made to the Board Chairpersons. Alternatively, in both such cases approaches may be made directly to the Lyra Safeguarding Leads, through the channels prescribed in the Whistleblowing Policy.

Every investigation of suspected bribery, corruption or fraud will result in a report written by the person who leads the investigation. This should be done regardless of whether any members of staff are dismissed or prosecutions made. The report will record the scale of the fraud, when and how it was perpetrated and by whom. In addition, the report will record; what action has been taken against the perpetrator, the actions to prevent further similar losses and to recover what has been lost. It will also usually be pertinent to note how the fraud was detected and whether or not existing controls were effective.

The report will be issued to the Lyra Senior Management team, and the Lyra (TZ) Board Chairperson. Lyra will strictly limit the distribution of the report. Copies will not be provided automatically to suspects or their representatives. If a disciplinary hearing takes place the individual and their representative may be entitled to receive a copy subject to obtaining legal advice.

Confidentiality of information

Lyra parties who reported in good faith suspicions of bribery, corruption or fraud shall not discuss the matter with anyone other than the person to whom the report is made, unless it was not addressed to the right person in the first place, as otherwise directed.

Lyra will take all appropriate measures to ensure that information reported remains confidential and is only disclosed to authorized individuals and investigators.

Lyra will protect the identity of those reporting in good faith and suspicions of bribery, corruption or fraud and take appropriate measures to protect them from retaliation. In case of a reasonable fear of adverse reaction from the person whom they reasonable suspect as having committed a fraud or a superior, reports may be made anonymously. In the situations whereby the person reporting the incident is need to provide evidence, that persons identity should only be revealed with his/ her consent or if required by law.

Acceptance:

I hereby certified that I have read and understood this Lyra's Anti- Bribery Corruption, and I confirm that I agree to abide in accordance with the Policy when I execute any task for or on behalf of Lyra.

Employee/Contractor/Consultant/Supplier/Other Stakeholder

(_____):

Full Name: _____

Position: _____

Date: _____

Signature: _____

For Lyra in Africa - Authorizing Manager/Staff:

Full Name: _____

Position: _____

Date: _____

Signature: _____

