



ANTI CORRUPTION/ANTI BRIBERY POLICY



TYPE OF DOCUMENT: INTERNAL AND EXTERNAL USE

VERSION: 1.1

REVISION

VERSION	DATE	REVISED SECTIONS	NAME
1.1	29.01.2019	CODE OF CONDUCT	GEORGE MANTE
Latest revision by: GEORGE MANTE			

*****THIS DOCUMENT IS TO BE REVISED ANNUALLY WITH SUPPORT AND ADVICE FROM LEGAL BASED ON OCCURRENCES IN THE COMPANY AND BEST PRACTICE.**

ALL NON-COMPLIANCE ISSUES SHOULD BE REPORTED TO:

legal@MONEYCARDonline.com

hr@MONEYCARDonline.com

TEL: 0302-318-036

1. INTRODUCTION

MONEYCARD LIMITED has as part of its duty to clients, the creation and maintenance of a corruption-free or bribe-free environment for all engagements related to the company both internally and externally. All employees of the company will comply with this policy or risk summary dismissal and/or possible legal action after internal investigations reveal non-compliance in conduct to this policy.

Laws such as the Labour Act, Companies Code, the Whistle Blowers Act, Financial Administration Act all serve as a guideline for the operational activities of the company. Where any part of this policy contradicts any of these acts or laws, the act or law upholds.

2. DEFINITIONS

- a. **Employee:** refers to all employees contractually engaged to render services to both the company and its clients.
- b. **Corruption:** fraudulent or dishonest conduct to give or receive favour in any form.
- c. **Bribery:** the act of giving, receiving, offering, or soliciting something of value in exchange for some kind of influence or action in return.
- d. **Gifts:** could also be termed as a **present** given or received without the expectation reciprocity. Under business conditions, reciprocity is difficult to establish. **All gifts to be declared to legal to avoid compromise of office or expectations from other party.** (this include but not limited to money, tickets, drinks, flights, hampers)
- e. **Facilitation Fees:** payments made to act as an incentive to expedite the completion of an action that is their routine duty.
- f. **Government Officials:** Any person with employment status (permanent or temporary, elected or appointed) with the Government of Ghana or any jurisdiction within which MONEYCARD LIMITED operates. This includes public officials and Government executives with authority to conduct business or engagements on behalf of government.

3. CODE OF CONDUCT

All employees of the company are to ascribe to the code of conduct outlined in the employee hand book to prevent situations of compromise especially in relation to bribery and corruption. Conduct that goes contrary to this policy has the potential to expose the company and employees to legal criminal penalties. For the avoidance of doubt the underlisted should be noted.

- a. **Soliciting Bribe:** Under no circumstances should the employees of MONEYCARD LIMITED be found soliciting for a bribe in order to influence an action or give undue advantage to any person or organisation. Employees should also be very vigilant when bribe is being solicited from them by an

individual or an organisation to influence an outcome or give the company undue advantage.

- b. Receiving Bribes:** MONEYCARD LIMITED employees are prohibited from receiving or accepting bribes in any form to perform a duty or give undue advantage to any person or organisation.
- c. Bribe Offers:** All employees (permanent and/or on fixed term contracts) must not under any circumstances offer bribe in any form to any individual or organisation in order to gain undue advantage in any dealings involving MONEYCARD. This prohibition includes facilitation fees, payments to media reps (SOLI) either made directly, through a third party or any other means or form.
- d. Political Exposure/ Appointments/ Donations:**

MONEYCARD LIMITED prohibits any employee from donating or contributing financially to any political party on behalf of the company. For the sake of business continuity, all political financial solicitation should be escalated and referred to legal.

Donations to NGO and other charitable organisations who do not have any business relationship with MONEYCARD LIMITED are exempt. If not sure please consult legal for advice.

Employees are not allowed to hold political appointments while with MONEYCARD LIMITED. An employee should inform Management /Head of Human Resource of any political appointment or plans to contest for a political office in not less than 60 days to allow MONEYCARD LIMITED fill their roles. Failure to do so will attract penalty to be determined by management of MONEYCARD LIMITED.

4. PREVENTIVE MEASURES

To ensure employees do not put themselves and the company in a compromised situation with respect to bribery and corruption, the following should be adhered to:

- a.** This policy should be reviewed and updated annually and circulated to all employees. HODs are to ensure each employee has received the updated version, read it and understands this policy.
- b.** All employees must demonstrate top notch commitment to the code of conduct and this policy.
- c.** This document is a mandatory policy to be discussed during inductions and onboarding.
- d.** All employees and business partners are encouraged to come forward and report any conduct that goes contrary to the code of conduct and this policy.
- e.** Training schedule to include refresher training on this policy.