



SEMA INTEGRITY POLICY

SEMA is committed to the highest standards of ethical conduct and integrity in its operations. SEMA operates on a zero tolerance policy in respect of any form of bribery or corruption. This policy details the obligations on each SEMA team member or partner to prevent and prohibit bribery and corruption.

We understand acts of corruption as offering or receiving anything of value as a bribe, whether cash or non-cash items, with the intention of inducing or rewarding improper performance of a function or activity. SEMA prohibits facilitation payments that are made to an official to expedite his/her performance of the routine duties s/he is already bound to perform.

All representatives and employees of SEMA are responsible for ensuring all operations and activities comply with this policy and local anti-bribery and anti-corruption laws. The following obligations are set for all representatives, trainees and employees of SEMA:

1. Any attempted, suspected or proven act of bribery or corruption should be directly raised with your supervisor. Retain all evidence, if available, (whatsapp, emails) and share this with the SEMA supervisor.
2. If an act of bribery is raised with you by another colleague, you should raise it with a SEMA management team member.
3. Promptly and thoroughly investigate, any and all, allegations of corruption, which may include reporting matters to SEMA's Board of Directors.
4. Report any gifts, rewards, gratuities, or entertainment received or offered to you from public officials, partners, grantees, or other organizational contacts that are seeking to do business. After discussion with a SEMA management team member, in some circumstances gifts may be asked to be returned to the sender.
5. Gifts of cash or cash equivalent must not be offered and always refused.

Signed

SEMA Employee

Date



Corruption can take the forms of;

1. **Bribery** - The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.)
2. **Embezzlement** - When a person holding office in an institution, organisation or company dishonestly and illegally appropriates, uses or traffics the funds and goods they have been entrusted with for personal enrichment or other activities
3. **Fraud** - The offence of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise).
4. **Extortion/ blackmail** - Act of utilising, either directly or indirectly, one's access to a position of power or knowledge to demand unmerited cooperation or compensation as a result of coercive threats.
5. **Abuse of privileged information** - Privileged account abuse occurs when the privileges associated with a particular user account are used inappropriately or fraudulently, either maliciously, accidentally or through willful ignorance of policies.
6. **Favoritism** - the practice of giving unfair preferential treatment to one person or group at the expense of another.
7. **Solicitation** - The act of a person asking, ordering or enticing someone else to commit bribery or another crime.
8. **Tax evasion/ tax avoidance** - Tax evasion is the illegal non-payment or under-payment of taxes, usually by deliberately making a false declaration or no declaration to tax authorities

In addition to the terms stated above, any other conduct determined to be detrimental to SEMA as an organization or the individuals within SEMA shall be left to the discretion of the SEMA management team members/ board of directors.

In the event that an employee or representative of SEMA is in breach of the above stated policy through negligence, ignorance or willfully, they are liable to termination of their contracts with SEMA or this can be a reason to not extend a contract.