



Anti-Bribery, Corruption and Fraud Policy

1. Purpose

School for Life Foundation (“SFL”) is committed to operating in a manner consistent with the laws and regulations of the jurisdictions in which it operates, including those relating to anti-bribery and corruption. Furthermore, SFL is committed to the highest standards of integrity, fairness and ethical conduct.

This policy is a critical part of SFL’s overall risk management framework to prevent and detect corrupt, illegal or otherwise undesirable conduct. The policy prohibits SFL, its Employees and Business Partners from engaging in activity that constitutes Bribery, Corruption, Fraud or other improper conduct. It outlines the responsibility of SFL and its Employees to observe and uphold the prohibition on Bribery, Corruption, Fraud and improper conduct, and outlines information and guidance on how to recognise and deal with suspected instances of such.

2. Scope and Responsibility

This policy applies to all of SFL’s businesses and transactions in all countries in which it operates, and covers:

- SFL and all subsidiaries and affiliate entities (including United Future Foundation Uganda); and
- All directors, officers, employees, consultants, contractors and volunteers of SFL (whether permanent, fixed-term, casual, contracting, consulting or temporary) (collectively referred to as “Employees”).

Individual and corporate entities associated with SFL, which act with, for or on behalf of SFL, or who perform functions in relation to or on behalf of SFL, are expected to have and comply with policies managing bribery and corruption risk. This includes, but is not limited to, contractors, consultants, third party agents, introducers, referrers, persons acting in a fiduciary capacity, service providers and joint venture partners in any of SFL’s operations (collectively referred to as “Business Partners”).

SFL may request copies of a Business Partner’s anti-bribery and corruption policy. Where no such policy exists, or is deemed to be inadequate, SFL expects its Business Partners to comply with this policy.

Every person covered by this policy is required to understand and comply with the policy and to comply with the reporting requirements set out in this policy.

3. Definitions

The following definitions apply for the purposes of this policy:

Bribe (or Bribery) – a bribe involves (either directly or indirectly) improperly offering or providing a benefit, inducement or something of value, either to a public either to a public official, someone in business or a close relative of such a person in order to obtain or retain business or an advantage or to induce or reward improper conduct or an improper decision. While a bribe may involve a monetary payment or offer, it covers anything of value such as:

- cash or cash equivalents (e.g. gift vouchers or loans);
- some gifts, hospitality, entertainment or travel;
- political or charitable donations or scholarships;
- reciprocal favours or the provision of favours (e.g. discounted or 'free' SFL services or use of SFL facilities or property);
- business and employment opportunities; and
- anything else that is of significant value to the recipient.

Business Partner – has the meaning given in Section 2.

Corruption – is any activity in which a person abuses their position and/or trust in order to achieve an improper gain or advantage for themselves or for another person or entity.

Employees – has the meaning given in Section 2.

Facilitation Payment – is any payment to a public official either directly or indirectly as an incentive for the public official to facilitate, expedite or secure the performance of a routine government action or process (for example, to facilitate the expedition of applications for visas or licences).

Fraud – is dishonest activity causing actual or potential financial loss to any person or entity - including theft of moneys or other property by Employees, Business Partners or other persons external to the entity - and where deception is used either at the time, immediately before, or immediately following the activity. Fraud also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or position for personal financial benefit.

Money Laundering – is concealing the existence of an illegal source of income and disguising that income to make it appear legitimate.

Secret Commissions – are benefits that are given, offered, received or solicited by an agent or representative of another person or entity, where that benefit is:

- not disclosed to the principal; and
- given, offered, received or solicited as an inducement or reward for providing or having provided a favour, or the receipt of which would tend to influence the provision of a favour.

For example, a payment to an agent of a customer or supplier where that agent does not disclose that payment to the customer or supplier, and in return, the agent facilitates favourable commercial terms with that customer or supplier.

4. SFL's Policy on Bribery, Corruption, Fraud and Other Related Improper Conduct

4.1 Bribery and Corruption

Corrupt conduct by SFL and its Employees is expressly prohibited. SFL and its Employees are not permitted to give, offer, promise, accept, request or authorise whether directly or indirectly, any Bribe, kickback or form of improper payment (however small). Further, SFL and its employees must not, directly or indirectly, authorise, undertake or participate in any form of corrupt business practice including:

- making a Facilitation Payment;
- paying any Secret Commission; or
- engaging in Money Laundering

4.2 Fraud

SFL and its Employees must not, directly or indirectly, authorise, undertake or participate in any form of Fraud.

5. Risk Mitigation Strategies

SFL will take all reasonable steps to ensure funds are not directed for the purposes of Bribery, Fraud, Corruption and other improper conduct. This will include:

- Requiring all staff to undertake appropriate Anti-Fraud, Anti-Corruption and Money Laundering training, and having staff understand and appreciate the potential financial and stock.
- Remaining compliant with all State and Commonwealth laws of Australia that relate to Bribery, Fraud, Corruption and Money Laundering
- Taking reasonable steps to be aware (and training staff and volunteers in being aware) of any risks in relation to Bribery, Fraud, Corruption or other improper conduct that SFL may be exposed to within its operations around the world and taking necessary precautions where such a risk is evident
- Taking reasonable steps to identify all beneficiaries and third parties with whom SFL works
- Conducting background checks to confirm the identity and integrity of a beneficiary or a third party. In ensuring proper identification methods of beneficiaries and third parties, SFL will seek to obtain and maintain the following information (supported by relevant identification documents) on beneficiaries and third parties with whom it deals:
 - (a) Names (including any aliases used) and other contact details
 - (b) For individuals, date of birth and nationality
 - (c) Details of current projects, operations, commitments or involvements being conducted or undertaken and the beneficiaries or third parties involved in such
 - (d) For companies or organisations, the
 - i. The objects or mission statement recorded in governing documents;
 - ii. Copies of governing documents (where applicable); and

- iii. The details set out in (a) and (b) above for representatives of the organisation or company
- Where it is not practicable to identify each beneficiary individually, SFL is committed to ensuring and maintaining an understanding of the particular group of beneficiaries such as the community, village, town or region (as the case may be) that is being assisted
- In relation to funding, SFL will maintain scrupulous accounts in accordance with international and local accounting standards, and ensure that funds are only used for intended purposes

6. Reporting Suspected or Actual Breaches

Employees should report any breaches or suspected breaches or suspicious activities or payments in accordance with the SFL Complaints Handling Policy or the SFL Whistleblower Policy. The Board will be informed of any material breaches of this policy. Processes are in place to ensure that reports are logged, investigated and appropriate action is taken. Measures are in place to ensure complaints are treated confidentially to the extent possible, and consistently with legislative protections.

7. Consequences of Breaching this Policy

Bribery, Corruption, Fraud and other related improper conduct referred to in this Policy may be criminal offences which could have serious consequences for SFL and the individuals involved, including substantial fines and liabilities, imprisonment and reputational damage. Any breach of this policy by Employees will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment.

Breaching this policy may also breach applicable anti-corruption laws and expose an individual to criminal and civil liability, which could result in imprisonment or the imposition of a significant financial penalty. Employees should also be aware that SFL's insurance policies may not provide coverage for conduct involving a breach of this policy.

Employees and Business Partners must cooperate fully and openly with any investigation by SFL into alleged or suspected corrupt activity or breach of this policy. Failure to cooperate or to provide truthful information is a breach of this policy.

8. SFL's Relationships with Third Parties

Any improper conduct by a third party, including Business Partners, may damage SFL's reputation and expose SFL and its Employees to criminal or civil liability or other sanctions. This may include liability for the conduct of agents, representatives and associates or those involved in negotiating any business arrangements or transactions including bidding for tenders, negotiating supply contracts, arranging introductions to potential business clients or key government decision makers. SFL and its Employees must not:

- enter into or continue a business relationship with a Business Partner if they cannot be satisfied that the entity will behave in a manner consistent with this Policy; or
- engage or make a payment to a Business Partner, or any other third party, knowing or suspecting the Business Partner or third party may use or offer all or a portion of the payment directly or indirectly as a bribe, kickback, secret commission or other form of improper or corrupt payment.

9. Record Keeping Requirements

SFL and its Employees must keep accurate and complete accounts, invoices, and other documents and records relating to dealings with any external or third party, which will evidence the business reason for these dealings. No accounts may be kept “off-the-books” for any reason or treated / managed in a way so as to facilitate, conceal or disguise potential breaches of this policy or other SFL Policies. Further, SFL Employees must:

- make no false or misleading entries in the books and records of SFL;
- ensure contracts, invoices and other documents relating to Business Partners and third-party relationships accurately describe the transactions to which they relate;
- abide diligently by payment control procedures; and
- abide diligently by requirements to record and obtain approvals for payments and expenses, including those relating to gifts, hospitality, entertainment, travel, charitable donations, sponsorships, political donations and community engagement activities.