



KARAMOJA TUMAINI NETWORK · KTN

Anti-Bribery and Anti-Corruption Policy

No payment, no gift, no favour, in either direction

Policy Category Governance Policy · Classification: Public

Adopted by the Board of Directors July 2026

Status Version 1.0 · Effective July 2026 · Next review July 2028

OUR COMMITMENT

Karamoja Tumaini Network prohibits bribery and corruption in every form and in both directions, without exception and without a threshold. No one acting for KTN may offer, promise, give, request, agree to receive or accept any advantage intended to influence a decision or to reward improper conduct.

This includes facilitation payments, however small and however customary. KTN does not make them, does not reimburse them, and does not disguise them in its accounts. Where a payment is forced by a genuine and immediate threat to someone's safety, that person is not at fault: they report it the same day and KTN records it honestly.

WHY IT MATTERS

A bribe is never paid with the payer's own money. At KTN it would be paid with money given for a child, by an organisation whose entire claim on public trust is that it does not trade children for anything. It is also the fastest way to lose the funding that has not yet arrived: a single facilitation payment in the accounts can end a grant and close a funder's door permanently. The line is far easier to hold from the beginning than to impose once a habit has formed.

WHERE IT APPLIES

Every board member, member of staff, volunteer, peer educator, intern, consultant and contractor, and every partner, sub-grantee and supplier acting in KTN's name. In dealings with officials, donors, communities and with each other, at an office, in the field, on the road, and outside working hours wherever KTN's name or position is involved.

HOPE · HEAL · EMPOWER

If refusing costs us time, we lose time. That is the trade this policy makes.

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List of Figures

This policy contains no numbered figures. Its process content is carried in the tables listed above, chiefly the prohibitions at Table 3, the reporting routes at Table 7 and the risk and control register at Table 8.

Policy Approval

This Anti-Bribery and Anti-Corruption Policy was considered and approved by the Board of Directors of Karamoja Tumaini Network in July 2026 and takes effect from that date as a governance instrument of the organisation. Compliance with it is mandatory for everyone within the scope set out in Chapter 2.

Field	Detail
Policy status	Approved
Approval authority	Board of Directors
Approval date	July 2026
Effective date	July 2026
Version	1.0
Board resolution reference	KTN/BRD/RES/2026/_____

The Board Secretary enters the resolution number from the minutes of the approving meeting before the signed copy is filed.

APPROVAL SIGNATURES



Chairperson, Board of Directors
Karamoja Tumaini Network · July 2026

A Statement of Commitment from the Board

This Board has taken a position that will sometimes be expensive. KTN does not pay to have a file moved, a permit issued or a vehicle waved through, and it does not pay when the sum is trivial, when the request is polite, or when everyone else is paying. We have set no threshold because a threshold is an invitation to find it.

We know what we are asking of our people. A worker at a counter or a checkpoint carries this decision alone, in the moment, with a queue behind them. So the Board says plainly: refuse, and KTN will carry the delay. Nobody at KTN will ever be criticised for a process that took longer because they would not pay. If a threat is made to your safety, your safety comes first: pay, leave, and tell us the same day. That is not a breach and it will never be treated as one.

The reason is not compliance. KTN exists for children whose lives were shaped by adults who traded them for something. An organisation that buys its way past an inconvenience has forfeited the standing to say anything about that. This policy is how the Board keeps that standing, and it applies to the Board itself first.

Chairperson, Board of Directors

Karamoja Tumaini Network

Adopted by resolution of the Board of Directors, July 2026.

Document Control

Field	Detail
Policy title	Anti-Bribery and Anti-Corruption Policy
Registered name	Karamoja Tumaini Network Limited, a company limited by guarantee without share capital, Reg. No. 80034272074698, incorporated on 1 July 2025 under the Companies Act; permitted to operate as a Non-Governmental Organisation by the National Bureau for Non-Governmental Organisations under permit number INDP000745-NB, file number MIA/NB/2026/06/7454
Version	1.0
Status	Approved and adopted by the Board of Directors
Approval date	July 2026
Effective date	July 2026
Policy owner	Karamoja Tumaini Network, acting through its Board of Directors
Policy custodian	The Executive Director, with the Board Chairperson as the route for any matter concerning the Executive Director
Applies to	All board members, staff, volunteers, peer educators, interns, consultants, contractors and their personnel, partner organisations, sub-grantees, suppliers and anyone acting for or on behalf of KTN
Related documents	The Finance and Anti-Fraud Policy; the Conflict of Interest Policy; the Code of Conduct; the Procurement and Asset Management Policy; the Whistleblowing and Protected Disclosure Policy; the Anti-Terrorism, Sanctions and Anti-Money Laundering Policy; the Sub-Grant and Downstream Partner Management Policy
Review frequency	Every two years, or earlier where required by a change in law, a donor requirement, organisational change, a serious incident, or an audit or evaluation finding (Chapter 9)
Next scheduled review	July 2028

Version Control Register

Version	Date	Description of change	Approved by
1.0	July 2026	First edition.	Board of Directors

Amendment History Register

No.	Date	Section(s) affected	Summary and approval reference
1	16 August 2026	Front matter; Contents; new 8.2; cross-references	Full front matter added, including this register, a Statement of Commitment from the Board, the Distribution List, Acronyms and Abbreviations, and an Executive Summary. Contents rebuilt as a live field carrying sub-headings. New Section 8.2, Records, Audit Trail and Retention. Two broken cross-references repaired. All tables captioned and numbered, and a List of Tables added. Issued under the approval recorded on the Policy Approval page.

Distribution List

Recipient	Format	Date issued
Board of Directors	Electronic copy and one signed paper copy	July 2026
Executive Director and all staff	Electronic copy, and briefing at induction	July 2026
Volunteers, peer educators and interns	Electronic copy, and briefing at induction	July 2026
Partners, sub-grantees and consultants	Electronic copy, with the Annex C clause in the agreement	On engagement
Suppliers and contractors	Annex A statement, with the Annex C clause in the agreement	On engagement
Donors and regulators on request	Electronic copy, or the Annex A statement alone	On request
Both offices	One paper copy at Kampala and one at Napak	July 2026

The policy custodian keeps this list current. The authoritative version of this policy is the electronic copy held by the custodian; printed copies are uncontrolled once issued.

Contact Information

KTN does not yet operate a dedicated telephone line. Contact is by email to the role addresses below, or in person at either office. Addresses are held by role and not by named person, so a change of staff never closes a route.

Field	Detail
Policy custodian	The Executive Director, with the Board Chairperson as the route for any matter concerning the Executive Director
General enquiries	info@karamojatumaini.org
Safeguarding concerns	safeguarding@karamojatumaini.org
Whistleblowing and concerns about a senior person	report@karamojatumaini.org
Kampala office	Da Joy House, Room JS05A, Waliggo Road, Komamboga, P.O. Box 10066, Kampala
Napak office	C/o Matany Trading Centre, Matany Town Council, Napak District
Website	www.karamojatumaini.org

Acronyms and Abbreviations

Acronym	Meaning
AB-nnn	Requirement reference used in Chapter 4 of this policy
AML	Anti-Money Laundering
CAFP	Chairperson of the Finance and Audit Sub-Committee
ED	Executive Director
FASC	Finance and Audit Sub-Committee of the Board
IG	Inspectorate of Government
KTN	Karamoja Tumaini Network Limited
NGO	Non-Governmental Organisation
PSEA	Protection from Sexual Exploitation and Abuse
PSWO	Probation and Social Welfare Officer
UGX	Uganda Shilling
UPF	Uganda Police Force

Key terms used in this policy are defined in Section 1.2.

Executive Summary

This is Karamoja Tumaini Network's authoritative statement on bribery and corruption. It prohibits both, in every form and in both directions, with no minimum value and no local exception, and it binds everyone who acts in KTN's name, including partners, sub-grantees, consultants and suppliers.

The policy does five things. First, it states the rule without qualification, including the prohibition on facilitation payments that Ugandan practice often treats as ordinary. Second, it makes refusing practical: Chapter 6 gives the words to use, the authority to walk away, and the assurance that KTN absorbs the delay. Third, it draws a workable line on gifts and hospitality, so that ordinary courtesy in a village is not criminalised while anything capable of influencing a decision is recorded or refused. Fourth, it protects the person who reports, including where the concern is about the Executive Director or a board member. Fifth, it gives funders a signed one-page statement, at Annex A, that answers a due-diligence question before it is asked.

One exception exists, and it is deliberate. A payment made under a genuine and immediate threat to personal safety is not a breach. It must be reported the same day, recorded in full and reported to the Board, but no one will be disciplined for choosing their life. A policy that ignored the road to Moroto would be ignored on it.

The policy is proportionate to what KTN is: a young, Karamojong-led organisation, thinly staffed, holding no major institutional funding yet, and about to meet its first grant agreements with anti-bribery clauses attached. Its controls are the ones a small organisation can actually operate, chiefly a gifts register open to any auditor, official fees paid only against official receipts, dual authorisation on payments, quarterly review by the Finance and Audit Sub-Committee, and a binding clause in every agreement KTN signs.

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CHAPTER ONE

INTRODUCTION

*Why a young organisation in Uganda needs this in writing,
and what the terms mean.*

1 Introduction

Why a young organisation in Uganda needs this in writing, and what the terms mean.

1.1 Why This Policy Exists

Karamoja Tumaini Network works in a setting where a small payment to make something happen is sometimes treated as normal. A clerk who will not release a document without something for lunch. A checkpoint on the road to Moroto. An official who will process a permit faster for a consideration. Anyone who has worked in this sector in Uganda has met at least one of these, and most people have met all three.

KTN's answer is the same in every case, and it does not depend on how small the amount is or how much delay refusing will cause. KTN does not pay. The reason is not only legal. KTN exists to protect children whose lives have been shaped by adults who traded them for something, and an organisation that pays to make a problem go away has no standing to say anything about that.

There is also a practical reason to be strict now rather than later. KTN is young, it holds no major funding, and its first institutional grants will come with anti-bribery clauses attached. A single facilitation payment recorded in the accounts can end a grant and can disqualify an organisation from a funder's pipeline permanently. It is far easier to hold this line from the beginning than to introduce it after a habit has formed.

POLICY STATEMENT

KTN prohibits bribery and corruption in every form, in both directions, without exception and without a threshold. Nobody acting for KTN may offer, promise, give, request, agree to receive or accept any financial or other advantage intended to influence a decision or to reward improper conduct.

This includes facilitation payments, however small and however customary. KTN does not make them, does not reimburse them, and does not treat them as an ordinary cost of doing business.

The only exception in this policy is a payment made under genuine and immediate threat to personal safety. Such a payment is not a breach, but it must be reported the same day and recorded.

1.2 Definitions

Term	Meaning in this policy
Bribery	Offering, promising, giving, requesting, agreeing to receive or accepting any financial or other advantage as an inducement or reward for someone performing a function improperly.
Corruption	The misuse of a position of trust for private gain, whether or not money changes hands.
Advantage	Anything of value: cash, mobile money, goods, a job for a relative, school fees, transport, a favour, preferential access to a service, or a promise of any of these.
Facilitation payment	A small payment to a public official to secure or speed up a routine action the official is already obliged to perform. Prohibited under this policy whatever it is called locally.
Kickback	A payment returned to a person who awarded a contract, a grant or a benefit, in exchange for having awarded it.
Public official	Anyone holding a legislative, administrative or judicial position, and anyone exercising a public function, including police, district officers, health and education staff, regulators and their agents.
Gift	Anything given or received without payment, including goods, services, discounts, hospitality and travel.
Hospitality	Meals, refreshment, accommodation, travel or entertainment provided to or by KTN.
Associated person	Anyone performing services for or on behalf of KTN, including consultants, contractors, sub-grantees, partners and agents. KTN can be answerable for what they do in its name.

Table 1. Definitions of key terms used in this policy.

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CHAPTER TWO

PURPOSE, OBJECTIVES AND SCOPE

What KTN commits to and who is bound by it.

2 Purpose, Objectives and Scope

What KTN commits to and who is bound by it.

2.1 Purpose

The purpose of this policy is to state KTN's position on bribery and corruption in terms clear enough that no worker, volunteer, partner or supplier can be uncertain about it, to give people a practical way of refusing without being left exposed, and to give funders and regulators a document that answers the question before they ask it.

2.2 Objectives

State the rule without qualification. Prohibit bribery in both directions, with no minimum amount and no local exception.

Make refusing possible. Give people the words to use, the authority to walk away, and the certainty that KTN will back them when a process is delayed as a result.

Control gifts and hospitality. Set a clear line between courtesy and inducement, and make the record public inside KTN.

Protect the reporter. Ensure anyone who reports is protected under the Whistleblowing and Protected Disclosure Policy, including where the report concerns the Executive Director or a board member.

Bind everyone acting for KTN. Impose the same prohibition on partners, sub-grantees, consultants and suppliers in writing.

Give funders a document they can file. Provide a signed one-page statement that can be sent on its own.

2.3 Scope

This policy binds every board member, member of staff, volunteer, peer educator, intern, consultant and contractor, and everyone acting for or on behalf of KTN. It applies to dealings with public officials, donors, partners, suppliers, communities and with each other. It applies whether the conduct takes place at an office, in the field, on the road, or outside working hours where KTN's name or position is involved.

It applies to advantages given and received in equal measure. A worker who accepts payment from a supplier in return for recommending them has breached this policy exactly as seriously as one who pays an official.

2.3.1 Where it bites hardest

The situations most likely to arise at KTN are: registration, permit and compliance processes; police and checkpoint encounters on the corridor; procurement of goods and services; the selection of beneficiaries, foster families and community volunteers; recruitment; and access to district officials whose cooperation KTN needs for a child's case. The last of these is the hardest, because the pressure comes with a child's welfare attached, and it is addressed directly in Section 7.1.

2.3.2 Work beyond Uganda

KTN does not currently operate in Kenya. Where cross-border work begins, this policy applies unchanged, together with the law of the country concerned and any extraterritorial law that applies to KTN's funders.

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CHAPTER THREE

GOVERNANCE FRAMEWORK

The Ugandan and international law that applies, and the principles behind KTN's position.

3 Governance Framework

The Ugandan and international law that applies, and the principles behind KTN's position.

3.1 Legal Framework

Source	What it means for KTN
The Anti-Corruption Act, 2009 (Cap. 116) as amended	The principal Ugandan statute. It criminalises corruption, bribery of and by public officials, abuse of office, and related conduct, and provides for penalties including imprisonment and confiscation of property.
The Penal Code Act, Cap. 128	Contains further offences relating to corruption and abuse of office.
The Leadership Code Act, 2002 (Cap. 33) as amended	Governs the conduct of specified public officers. Relevant to KTN because it constrains what an official may lawfully accept, which is a useful thing to be able to say out loud when refusing.
The Inspectorate of Government Act, 2002 (Cap. 32)	Establishes the Inspectorate of Government, to which corruption involving a public official may be reported.
The Anti-Money Laundering Act, 2013 (Cap. 118)	The proceeds of corruption are criminal property. Handling them engages this Act and KTN's Anti-Terrorism, Sanctions and Anti-Money Laundering Policy.
The Companies Act, 2012 (Cap. 106)	Directors must act in the interests of the company and with care and diligence. Tolerating corruption is a breach of those duties.
The Non-Governmental Organisations Act, 2016 (Cap. 109)	KTN must operate lawfully and within its permit. A corruption finding puts the permit at risk.
Extraterritorial law applying through funders	Grants from United Kingdom or United States sources commonly carry obligations derived from those countries' anti-bribery laws, which can reach conduct in Uganda. KTN identifies any such clause at signature and records it in the grant file.

Table 2. The legal framework that applies to KTN.

3.2 Principles

No threshold. There is no amount small enough to be acceptable. A thousand shillings offered to move a file is a bribe.

Both directions. Giving and receiving are treated the same.

Custom is not a defence. That a payment is usual, expected or requested politely changes nothing.

Delay is cheaper than a bribe. KTN would rather wait weeks for a document than pay to have it today, and no worker is criticised for a delay caused by refusing.

Safety comes first. Where there is a genuine and immediate threat to personal safety, pay and get out. Report it the same day. KTN will not discipline anyone for choosing their life.

Write it down. Every offer, every request, every gift and every refusal is recorded, including the ones that came to nothing.

The reporter is protected. Reporting in good faith is never held against anyone, and retaliation is itself a disciplinary matter.

Silence is complicity. Knowing and saying nothing is a breach of this policy in its own right.

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CHAPTER FOUR

POLICY REQUIREMENTS

The prohibitions, and the rules on gifts, hospitality and dealings with officials.

4 Policy Requirements

The prohibitions, and the rules on gifts, hospitality and dealings with officials.

4.1 Requirements: The Prohibitions

Ref	Requirement
AB-001	No person acting for KTN shall offer, promise, give, request, agree to receive or accept any financial or other advantage intended to influence a decision or to reward improper conduct.
AB-002	No facilitation payment shall be made, whatever it is called and however small. KTN shall not reimburse one, and no such payment shall be recorded in the accounts under any other description.
AB-003	No kickback shall be given or received in connection with any contract, grant, sub-grant, employment or benefit.
AB-004	No payment or advantage shall be given or received in connection with the selection of a beneficiary, a foster family, a community volunteer or a participant in any KTN programme. A place in a KTN programme is never for sale and is never a favour.
AB-005	No political contribution shall be made by or on behalf of KTN, in cash or in kind, to any party, candidate or campaign.
AB-006	No charitable donation or community contribution shall be made where it is requested by, or benefits, a person in a position to influence a decision affecting KTN. Any community contribution shall be approved by the Board and recorded.
AB-007	Where a payment is made under a genuine and immediate threat to personal safety, it shall be reported to the Executive Director the same day, recorded in full with the circumstances, reported to the Board at its next meeting, and recorded honestly in the accounts. It shall not be treated as a breach of this policy by the person who made it.
AB-008	Any person who becomes aware of a breach or attempted breach shall report it under Chapter 6. Failing to report is itself a breach.

Table 3. The prohibitions.

4.2 Requirements: Gifts and Hospitality

KTN works in communities where refusing food or a small token can cause real offence, and a policy that ignored that would be ignored in turn. The line KTN draws is between courtesy that could not influence anyone and anything that could.

Ref	Requirement
AB-009	No gift or hospitality shall be given or accepted where it could reasonably be seen as intended to influence a decision, whatever its value.
AB-010	No cash or cash equivalent, including mobile money and vouchers, shall be given or accepted as a gift in any amount.
AB-011	Modest hospitality offered in the course of community work, such as a meal or refreshment shared in a village, may be accepted where refusing would cause offence, and shall be recorded in the gifts register where its value exceeds the threshold set by the Board.
AB-012	Every gift or hospitality offered, whether accepted or declined, with a value above the threshold set by the Board shall be entered in the gifts register in Annex B within five working days.
AB-013	No gift or hospitality shall be given or accepted during an active procurement, grant application, audit, inspection or recruitment process, whatever its value.
AB-014	A gift that cannot properly be declined shall be accepted on behalf of KTN rather than personally, recorded, and dealt with as the Executive Director directs, which may include use for the benefit of children or donation onward.
AB-015	The gifts register shall be reviewed by the Finance and Audit Sub-Committee quarterly and shall be available to any auditor or funder on request.

Table 4. Gifts and hospitality.

4.3 Requirements: Officials, Partners and Suppliers

Ref	Requirement
AB-016	Every interaction with a public official concerning a permit, registration, inspection, licence, case referral or enforcement matter shall be conducted openly, and any request for a payment or advantage shall be recorded and reported the same day.
AB-017	Any fee paid to a government body shall be an official fee, paid by traceable means to the body itself against an official receipt. No fee shall be paid in cash to an individual.
AB-018	Every partner, sub-grantee, consultant, contractor and supplier agreement shall contain the clause in Annex C, prohibiting bribery, requiring notification to KTN, and entitling KTN to suspend and terminate.
AB-019	Anti-bribery shall form part of the due diligence carried out under the Sub-Grant and Downstream Partner Management Policy, including asking directly whether the partner has a policy and whether it has had a corruption matter.
AB-020	No agent or intermediary shall be engaged to obtain a permit, licence or approval on KTN's behalf where the basis of their fee is not fully transparent.
AB-021	Where a donor requires notification of a suspected corruption matter, that requirement shall be followed. Where a donor agreement is silent, KTN shall notify any affected donor in writing within five working days of a concern being assessed as credible.

Table 5. Officials, partners and suppliers.

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CHAPTER FIVE

ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

Who is accountable, and the route where the concern is about a senior person.

5 Roles, Responsibilities and Accountabilities

Who is accountable, and the route where the concern is about a senior person.

5.1 Roles and Responsibilities

Who	What they are accountable for
Board of Directors	Owns this policy. Sets the gifts threshold and the community contribution rule. Receives the gifts register and any reported matter. Decides on any matter involving the Executive Director.
Board Chairperson	The route for any concern about the Executive Director. Ensures the matter is handled without the Executive Director's involvement.
Chairperson of the Finance and Audit Sub-Committee	The route for any concern about the Board Chairperson or a board member. Convenes the Board without the person concerned present.
Finance and Audit Sub-Committee	Reviews the gifts register quarterly. Samples payments to government bodies against official receipts. Reports to the Board.
Executive Director	Day to day accountability. Receives reports. Decides how a gift that cannot be declined is dealt with. Notifies donors. Reports to the Board.
Finance function	Ensures no payment is made in cash to an individual where an official fee is due, and that no payment is recorded under a misleading description.
Everyone acting for KTN	Refuse. Record. Report. Nobody is expected to decide alone whether something was a bribe; the duty is to report it and let it be assessed.

Table 6. Roles and responsibilities.

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CHAPTER SIX

PROCEDURES AND OPERATIONAL REQUIREMENTS

What to do when asked for a bribe, how to record a gift, and how a report is handled.

6 Procedures and Operational Requirements

What to do when asked for a bribe, how to record a gift, and how a report is handled.

6.1 When You Are Asked for a Payment

This will happen to someone at KTN, probably at a checkpoint or a government counter. What follows is what to do, in order.

Do not pay. Not a small amount, not to save time, not because everyone does.

Say it is not possible, and say why. Something like: I am sorry, I cannot do that. My organisation does not allow any payment outside an official receipt, and I would lose my job. Attributing the refusal to a rule rather than to a personal judgement gives the other person a way to withdraw without losing face.

Ask for the official position. Ask what the official fee is, where it is paid and what receipt is issued. Ask for the request in writing. Both requests usually end the conversation.

Offer to come back. Ask to return with a supervisor, or ask for the name of the person's superior. Delay is acceptable to KTN.

Call. Contact the Executive Director. If you cannot reach them, contact the Board Chairperson. You do not have to resolve this alone at the counter.

If you are threatened, pay and leave. Where there is a genuine and immediate threat to your safety, your safety comes first. Pay, leave, and report the same day. This is not a breach of this policy and nobody will treat it as one.

Write it down the same day. What was asked, by whom, where, when, what you said, and what happened. Report it whether or not anything was paid.

6.1.1 If you are offered something

Decline it. Say that KTN does not permit it. Record the offer in the gifts register even though you declined, and tell the Executive Director. A declined offer is important information: it tells KTN who is willing to try, which matters when the same person appears in a procurement six months later.

6.2 Reporting and How Reports Are Handled

6.2.1 Where to report

KTN does not yet operate a dedicated telephone line. Reports are made by email to the role addresses below, in person at either office, or through a supervisor. Addresses are held by role and not by named person, so a change of staff never closes a route. A dedicated toll-free line is a funded priority and this section will be amended to carry the number once it is live.

The concern is about	Report to	Address
A member of staff, a volunteer, a supplier or a partner	Executive Director	info@karamojatumaini.org
The Executive Director	Board Chairperson	report@karamojatumaini.org
A board member, or the Board Chairperson	Chairperson of the Finance and Audit Sub-Committee	report@karamojatumaini.org
Anything, where you prefer to remain anonymous	Any of the above, under the Whistleblowing and Protected Disclosure Policy	report@karamojatumaini.org
A public official, where you wish to report outside KTN	The Inspectorate of Government, or the Uganda Police	Directly, and you keep every protection this policy gives

*Table 7. Where to report, and to whom.***6.2.2 What happens next**

The person receiving the report acknowledges it within three working days and records it in a confidential register. An initial assessment is made within ten working days: whether the concern is credible, what is already known, and whether anyone is at risk. Where it is credible, an investigation is commissioned under the Finance and Anti-Fraud Policy, and where a public official or a criminal offence is involved, the matter is reported to the Uganda Police or the Inspectorate of Government and KTN cooperates fully.

Nobody investigates a matter in which they have any interest, and nobody investigates a concern about themselves or about a person to whom they report. Where the concern touches donor funds, the donor is notified under AB-021 before the investigation concludes, not after.

6.2.3 Protection

Anyone who reports in good faith is protected under the Whistleblowing and Protected Disclosure Policy, whether or not the concern turns out to be well founded. Retaliation of any kind, including exclusion from work, adverse treatment or pressure to withdraw a report, is a disciplinary matter in its own right and is treated as seriously as the original concern.

6.3 The Gifts Register in Practice

The register is a single spreadsheet held by the finance function, open to any board member, the Sub-Committee, an auditor or a funder. Entries are made within five working days, and a declined offer is recorded as well as an accepted one.

The Board sets the value threshold above which an entry is required and reviews it annually. Below the threshold, ordinary courtesy such as tea at a meeting or a shared meal in a village does not need recording. Above it, everything does, including hospitality provided by a donor or a partner. Where anyone is unsure whether an item is above the threshold, they record it. An over-full register has never caused a problem for anyone.

Board members and the Executive Director record their own entries in the same register as everyone else. A register that contains only junior staff entries is a sign that it is not being used.

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CHAPTER SEVEN

RISK MANAGEMENT AND INTERNAL CONTROLS

Where KTN is exposed and what actually reduces it.

7 Risk Management and Internal Controls

Where KTN is exposed and what actually reduces it.

7.1 Risk and Controls

Where the exposure is	What reduces it at KTN's size
Registration, permits and compliance processes	Official fees only, paid by traceable means to the body itself against an official receipt. No cash to individuals. Delay accepted rather than paid around, and the Board informed where a process is stalled.
Checkpoints and police encounters on the corridor	Drivers briefed on the script in Chapter 6 and told explicitly that KTN backs a refusal. Safety exception in AB-007 so that nobody is trapped between the policy and a threat. Every encounter recorded.
Procurement of goods and services	Competitive process under the Procurement and Asset Management Policy. Conflict declarations. No gifts during an active procurement. Dual authorisation on payment.
Selection of beneficiaries, foster families and volunteers	Written criteria applied by more than one person. AB-004 states that a place is never for sale. Community feedback route under the Complaints and Community Feedback Procedure so that a family asked for something has somewhere to say so.
Recruitment	Written criteria, more than one person on any panel, and conflict declarations before shortlisting.
Access to district officials whose cooperation a child's case depends on	This is the hardest case, because a child's welfare is attached to the outcome. The rule does not change: no payment. The response is to escalate to the Executive Director, engage the official's superior or the district structure, and record the delay and its effect on the child. Where a child is at immediate risk, the Police and the Probation and Social Welfare Officer are engaged directly.
Thin staffing, so the same person may request and approve	Dual authorisation on every payment. Quarterly sampling by the Finance and Audit Sub-Committee. The combined role is recorded on the corporate risk register and reported to the Board until it is separated.
A partner or sub-grantee pays a bribe in KTN's name	Annex C clause in every agreement. Anti-bribery in due diligence. Right to suspend, terminate and recover.

Table 8. Where KTN is exposed, and what reduces it.

8

CHAPTER EIGHT

COMPLIANCE, MONITORING AND REPORTING

What is checked and what reaches the Board.

8 Compliance, Monitoring and Reporting

What is checked and what reaches the Board.

8.1 Compliance, Monitoring and Reporting

What is checked	By whom	How often	Where it goes
The gifts register, including whether senior people appear in it	Finance and Audit Sub-Committee	Quarterly	Written report to the Board
Payments to government bodies matched to official receipts	Finance and Audit Sub-Committee	Quarterly sample	Board pack
That no payment is recorded under a misleading description	Finance function, then the Sub-Committee	Monthly, then quarterly	Management accounts
That the Annex C clause is in every agreement signed in the period	Executive Director	Quarterly	Board pack
Reports received, and how each was handled	Executive Director, or the Chairperson where the Executive Director is concerned	Quarterly	Confidential report to the Board
That everyone has read and signed the policy	Whoever holds the human resources function	On engagement and annually	Personnel file
Requests for a payment recorded, whether or not anything was paid	Executive Director	As they arise	Risk register and Board

Table 9. What is checked, by whom, and how often.

8.2 Records, Audit Trail and Retention

A policy that cannot be audited cannot be relied on. Everything this policy requires leaves a record, and the value of that record is that it exists before anyone needs it. The gifts register matters most on the day a funder asks to see it, and by then it is too late to start one.

The audit trail

Recorded when it happens. Every offer, request, gift and refusal is entered in the gifts register at Annex B within five working days, whether it was accepted or declined and whether or not anything changed hands. A declined offer is evidence, not a non-event.

Every decision, with its reason. Where a gift is accepted on KTN's behalf, where a community contribution is approved, or where a payment is made under threat, the decision is recorded with who made it, when, and on what grounds. A record that shows only the outcome cannot be audited.

One controlled register. The gifts register is a single file held by the finance function, not a set of personal notes. Board members and the Executive Director record their own entries in it. A register containing only junior entries is a sign it is not being used.

No silent edits. Entries are not altered after the fact. A correction is made as a new dated entry that explains what was wrong, so the sequence of what was known and when survives.

Official money leaves an official trail. Every fee paid to a government body is paid by traceable means against an official receipt, and the receipt is filed with the payment voucher. No payment is recorded under a description that conceals what it was.

Systems keep their own log. Where the register or the case records are held electronically, the system records who opened and changed each entry, and those logs are retained under the schedule below.

Retention periods

The periods below are minimums. Where a donor agreement, an open investigation, a police or Inspectorate of Government matter, or a legal claim requires longer, the longer period applies and the record is not disposed of until the matter is closed.

Record	Minimum retention	Held by
Gifts and hospitality register	10 years from the end of the financial year	Finance function
Report of a bribery or corruption concern, and its assessment	10 years from closure	Executive Director, or the Chairperson where the concern is about the Executive Director
Investigation file where the allegation was substantiated	25 years from closure	Board, through the policy custodian
Record of a payment made under threat to personal safety	10 years from the date of the payment	Executive Director, copied to the Board
Record of a request for a payment, whether or not anything was paid	7 years from the date recorded	Executive Director
Official fees paid to government bodies, with receipts	7 years from the end of the financial year	Finance function
Signed policy acknowledgements and training records	7 years from the end of engagement	Whoever holds the human resources function
Agreements containing the Annex C clause, and due diligence records	7 years from the end of the agreement	Executive Director
Board and Sub-Committee papers recording this policy's reports	Permanent	Board Secretary
System access and edit logs for the register	12 months, with 3 months immediately retrievable	Whoever holds the information technology function

Table 10. Minimum retention periods.

Protection, review and disposal

Protected while held. Paper records are held under lock by the custodian and electronic records are restricted to those who need them. Reports naming individuals are handled under the Data Protection and Privacy Policy.

Reviewed once a year. The custodian reviews the register and the case files annually against this schedule, and reports to the Finance and Audit Sub-Committee that the review has been done.

Disposed of so it cannot be recovered. Paper is shredded and electronic records are deleted from live systems and backups. What was destroyed, when, and on whose authority is itself recorded, and that record is kept.

9

CHAPTER NINE

ENFORCEMENT, IMPROVEMENT AND REVIEW

Consequences, and keeping this policy current.

9 Enforcement, Improvement and Review

Consequences, and keeping this policy current.

9.1 Consequences

Bribery is gross misconduct. A person found to have given or received a bribe will normally be dismissed, and KTN will report the matter to the Uganda Police or the Inspectorate of Government where an offence appears to have been committed. KTN will pursue recovery of any loss.

Knowing of a bribe and not reporting it is also a disciplinary matter. So is retaliating against someone who reported, and so is obstructing an investigation.

A partner, sub-grantee, consultant or supplier that breaches this policy has its agreement suspended immediately and terminated, and KTN recovers funds where the agreement or a funder's rules allow.

A payment made under a genuine and immediate threat to personal safety, reported the same day, is not a breach. Nobody at KTN will be disciplined for it, and this is stated here so that nobody hesitates in the moment.

9.2 Review and Improvement

This policy is reviewed every two years, and earlier where the law changes, where a donor imposes a stricter requirement, where a matter is reported that this policy did not anticipate, or where the gifts threshold needs revisiting.

9.2.1 What changes as KTN grows

Trigger	What this policy becomes
First institutional grant with an anti-bribery clause	The clause is recorded in the grant file and any requirement stricter than this policy is adopted across the organisation, not only for that grant.
Staff numbers allow separation of requesting and approving	The compensating control in Section 7.1 is withdrawn and the combined role comes off the risk register.
First sub-grant issued	Anti-bribery due diligence and the Annex C clause are applied from the first award.
A dedicated toll-free line is established	It becomes an additional reporting route in Chapter 6 and this policy is amended to carry the number.
First operation outside Uganda	The law of the country concerned and any extraterritorial law applying to KTN's funders are identified before the first activity.

Table 11. What changes as KTN grows.

10

CHAPTER TEN

ANNEXES

The one-page statement, the gifts register and the agreement clause.

10 Annexes

The one-page statement, the gifts register and the agreement clause.

10.1 Annex A: Anti-Bribery Statement

This page is written so that it can be extracted and sent on its own in response to a donor questionnaire, a partner due diligence request or a supplier enquiry. It carries the same authority as the policy from which it is taken.

STATEMENT OF KARAMOJA TUMAINI NETWORK ON BRIBERY AND CORRUPTION

Karamoja Tumaini Network Limited is a company limited by guarantee without share capital, registration number 80034272074698, incorporated on 1 July 2025 under the Companies Act, and permitted to operate as a Non-Governmental Organisation by the National Bureau for Non-Governmental Organisations under permit number INDP000745-NB.

KTN prohibits bribery and corruption in every form and in both directions. No board member, member of staff, volunteer, intern, consultant, contractor, partner, sub-grantee or supplier acting for KTN may offer, promise, give, request, agree to receive or accept any financial or other advantage intended to influence a decision or to reward improper conduct.

This prohibition has no minimum value. It extends to facilitation payments, however small and however customary, which KTN does not make, does not reimburse and does not record under any other description. It extends to kickbacks, to political contributions, and to any payment or favour connected with the selection of a beneficiary, a foster family or a participant in any KTN programme.

Gifts and hospitality are controlled. Cash and cash equivalents are never given or accepted as gifts. Anything above the threshold set by the Board is recorded in a gifts register that is open to auditors and funders, and nothing is given or accepted during an active procurement, grant application, audit, inspection or recruitment.

Every partner, sub-grantee, consultant, contractor and supplier agreement contains a binding anti-bribery clause with rights of suspension, termination and recovery.

Concerns are reported to the Executive Director, or to the Board Chairperson where the concern is about the Executive Director, or to the Chairperson of the Finance and Audit Sub-Committee where it is about a board member. Anyone reporting in good faith is protected, and retaliation is a disciplinary matter. Where an offence appears to have been committed, KTN reports it to the Uganda Police or the Inspectorate of Government and cooperates fully.

Bribery is gross misconduct at KTN and will normally result in dismissal and referral to the authorities.

This statement is issued under the authority of the Board of Directors of Karamoja Tumaini Network and reflects the Anti-Bribery and Anti-Corruption Policy approved by the Board in July 2026.

10.2 Annex B: Gifts and Hospitality Register

Held by the finance function. Entries within five working days. Declined offers are recorded as well as accepted ones.

Column	What goes in it
Entry number	Sequential, never reused
Date	When it was offered, not when it was recorded
Who recorded it	Name and role
Given or received	Which direction
Other party	Person and organisation, and whether they are a public official
Description	What it was
Estimated value	In shillings, honestly estimated where not known
Context	What KTN's relationship with that party is, and whether any process involving them was active at the time
Accepted or declined	And on whose authority

Where it went	Where accepted on KTN's behalf: what was done with it
Reviewed	Date the Sub-Committee reviewed the entry

Table 12. The gifts and hospitality register.

10.3 Annex C: Standard Clause for Agreements

Included in every partner, sub-grant, consultancy, contractor and supplier agreement.

MODEL CLAUSE

The Party shall not, in connection with this agreement or with any matter involving Karamoja Tumaini Network, offer, promise, give, request, agree to receive or accept any financial or other advantage intended to influence a decision or to reward improper conduct, and shall not make any facilitation payment of any value.

The Party shall notify KTN in writing immediately on becoming aware of any breach or attempted breach of this clause, whether by its own personnel or by any person engaged by it.

The Party shall impose these same obligations in writing on any sub-contractor, sub-grantee or agent it engages on this work, and shall keep records sufficient to demonstrate compliance and make them available to KTN, its funders and its auditors on reasonable notice.

Breach of this clause entitles KTN to suspend payment immediately, to terminate the agreement with immediate effect, and to recover funds where a funder's rules so require. This clause survives termination.



SHIELDING PASTORALIST CHILDREN · BUILDING FUTURES · LEADING CHANGE

Behind every number is a child with a name.

A bribe paid on KTN's behalf is not a shortcut. It is a debt charged to a child in Napak who will never know it was taken in their name. This policy exists so that no one acting for KTN can decide otherwise.

Karamoja Tumaini Network

Hope · Heal · Empower

info@karamojatumaini.org · www.karamojatumaini.org

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY · VERSION 1.0 · EFFECTIVE JULY 2026