Fraud and conflict of interest policy

Version. 1

FOR

ADROIT BIOMEDICAL AND BIO-ENTERPRENEURSHIP

RESERCH SERVICES

(ABBRS)

P. O. Box 112139 KAMPALA,
NAGURU-KAMPALA
Email: grants@abbrs-uganda.org

Prepared by: Administration

Reviewed by: Ethics & Legal

Approved by:

Board of Directors

Purpose of the Statement

This Statement summarises the ABBRS's approach to conflict of interest and fraud. The policy defines the subject matter and how to deal with it and the challenges that arise from it.

Conflict of Interest

ABBRS seeks to avoid potential conflicts of interest posed by close personal relationships between employees and clients, beneficiaries, or other individuals participating in the collaboration's activities. As used in this policy:

Close personal relationships: include close familial relationships such as spouse, parents, children, siblings, cousins, and other relations, or consensual sexual or romantic relationships.

To ensure that close personal relationships between employees and clients or beneficiaries do not influence decisions with respect to hiring, promotion, or access to funds or other financial resources, information and goods or services provided by ABBRS, the following guidelines will be followed.

- Any employee engaged in a close personal relationship with another person as defined in this policy is responsible for disclosing this relationship in writing to their immediate supervisor, or to someone higher in position.
- Every employee is also responsible for notifying their immediate supervisor in writing if a close personal relationship ends.
- Employees are prohibited from providing any assistance or service such as access to materials, money or other financial resources or any other goods or services provided by ABBRS through any collaboration office to anyone with whom they have a close personal relationship.
- Employees are also prohibited from supervising and participating in any hiring, promotion, and evaluation decisions, either directly or indirectly that may affect an individual with whom they have a close personal relationship.
- When informed of a close personal relationship in accordance with this policy, the Human resource manager, in conjunction with the Board of directors will recommend steps to eliminate any potential for conflict of interest.
- In the case of a supervisor-subordinate close personal relationship, the employee will be reassigned to another person for supervision.
- Failure to disclose the existence or end of a close personal relationship in accordance with this policy is considered to be fraud and is a cause for disciplinary action.
- Employees who believe this policy is being violated and have evidence should immediately report the concern to a supervisor, or the People and Culture Manager.

Fraud

Transactions with outside firms must be conducted within a framework established and controlled by the established internal structures and policies. The following guidelines will be followed:

- Business dealings with outside firms should not result in unusual gains for staff. Unusual gains refer to bribes; product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, or both. Promotional plans that could be interpreted to involve unusual gain require specific approval.

- Personal gain could result not only in cases where an employee or relative has a significant ownership in a firm with which the ABBRS does business but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration because of any transaction or business dealings involving the collaboration. These activities are strictly prohibited by ABBRS. Violations will be cause for immediate termination and if warranted, legal action.
- No "presumption of guilt" will be made by the mere existence of a relationship with outside firms. However, if an employee has any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose the existence of any actual or potential conflict of interest as soon as possible to the P&CM so that safeguards can be established to protect all parties. If an employee is found guilty of fraud, they will be summarily dismissed given the fact that this is a grave offence.