



ANTI-BRIBERY AND CORRUPTION (ABC) POLICY

1.1 Purpose

The purpose of this Anti-Bribery and Corruption (ABC) Policy is to uphold NSI's commitment to integrity, transparency, and accountability in all its operations.

NSI maintains a zero-tolerance approach to bribery, fraud, corruption, or any unethical practice that undermines trust, donor confidence, or the welfare of the communities we serve.

1.2 Scope

This policy applies to all NSI employees, volunteers, consultants, suppliers, implementing partners, and any third parties acting on behalf of the organization.

It covers all organizational activities, including procurement, financial management, partnerships, grant implementation, and stakeholder engagement.

1.3 Key Policy Principles

1. **Zero Tolerance:** Bribery and corruption in any form are strictly prohibited.
2. **Transparency:** All transactions and decisions must be conducted openly and documented.
3. **Accountability:** Staff must report suspected unethical practices promptly.
4. **Fair Dealing:** All procurement and partner selection must be objective and merit-based.
5. **Conflict of Interest:** Staff must declare any personal interest that could affect impartiality.

1.4 Prohibited Acts

- Offering, giving, receiving, or soliciting any bribe or inducement.
- Misuse of office, confidential information, or donor funds for personal gain.
- Falsifying records, inflating budgets, or fabricating receipts.
- Nepotism, favoritism, or kickbacks during hiring or procurement.

1.5 Reporting & Whistleblowing

All suspected cases of bribery or corruption must be reported immediately to the Compliance Officer through any of the official reporting channels (email, phone, or SAR form).

NSI guarantees confidentiality and protection against retaliation under its Whistleblower Protection Policy.

1.6 Monitoring and Enforcement

- Regular audits and compliance checks will be conducted.
- Confirmed violations may result in disciplinary action, termination, or legal referral.
- The Compliance Officer will maintain a **Bribery & Corruption Register** and submit quarterly summaries to the Executive Director.

1.7 Training & Awareness

All staff must complete initial orientation and annual refresher training on ethical conduct, fraud prevention, and reporting mechanisms.

Executive Director's Commitment Statement

"As Executive Director of NSI, I affirm our full commitment to integrity and ethical governance.

We will uphold this Anti-Bribery and Corruption Policy as a foundation of our credibility and ensure that every staff and partner demonstrates honesty and accountability in all dealings.

Together, we will sustain a culture of trust and transparency."

— Executive Director, NSI

Muhammad Aminu Salihu Zubairu Yushau Armiyau

Staff Acknowledgement

I, _____, have read and understood the NSI Anti-Bribery and Corruption Policy. I commit to upholding its principles and to reporting any unethical conduct or suspected corruption immediately.

Signature: _____ Date: _____

