



**GOLDEN BOOTS UGANDA**

**THE ANTI-FRAUD AND WHISTLE BLOWING POLICY**

**January, 2021**

## Table of Contents

CHAPTER 1: .....	3
1.1 GENERAL PRINCIPLES .....	3
1.1.1 Overview .....	3
1.1.2 Objectives .....	3
1.1.3 Implementation .....	3
Purpose: .....	3
CHAPTER 2: .....	5
2.1 DEFINITION AND CATEGORIES OF FRAUD .....	5
2.1 Definition .....	5
2.2 Examples of Fraud and Fraudulent Behaviour .....	5
CHAPTER 3: .....	6
3.1 OVERSIGHT AND RESPONSIBILITIES .....	6
CHAPTER 4: .....	6
4.1 PREVENTION AND CONTROL OF FRAUD .....	6
CHAPTER 5: .....	7
5.1 REPORTING FRAUD OR FRAUDULENT BEHAVIOUR .....	7
CHAPTER 6: .....	8
6.1 THE FINANCE & ADMINISTRATION DEPARTMENT AND ITS FUNCTION .....	8
CHAPTER 7: .....	9
7.1 GUIDANCE AND SUPERVISION FOR ANTI-FRAUD .....	9
CHAPTER 8: .....	9
8.1 WHISTLEBLOWING .....	9
9.1 APPLICABLE SCOPE .....	10
10.1 APPROVAL AND MODIFICATION OF THE POLICY .....	10

## **CHAPTER 1:**

### **1.1 GENERAL PRINCIPLES**

#### **1.1.1 Overview**

Golen Boots Uganda as an organization establishes this Anti-Fraud and Whistle Blowing Policy (the “**Anti-Fraud Policy**”) as it is committed to the highest possible standards of openness, honesty and accountability in all of its affairs. Golen Boots Uganda is determined to maintain a culture of honesty and opposition to fraud and corruption. Based on this commitment, the Anti-Fraud and whistle blowing Policy outlines the principles to which the Founder and Staff are committed in relation to preventing, reporting and managing fraud and corruption. This Policy reinforces the Golen Boots Uganda’s approach by articulating the core values and by setting out the ways in which employees or members of the public can voice their concerns about suspected fraud or corruption. It also outlines who in Golen Boots Uganda will deal with such complaints.

#### **1.1.2 Objectives**

The primary objective of this Anti-Fraud & Whistle Blowing Policy is to prevent fraud, enhance Golen Boots Uganda’s governance and internal controls, maintain integrity in the organization business dealings, establish procedures and protections that allow employees of Golen Boots Uganda and members of the public to act on suspected fraud or corruption with potentially adverse ramifications and to achieve the legitimate strategic objectives Golen Boots Uganda for the benefit of its shareholders.

#### **1.1.3 Implementation**

This Anti-Fraud & Whistle Blowing Policy shall be implemented immediately upon its approval and adoption by the Golen Boots Uganda’s Founding CEO. This Anti-Fraud & Whistle Blowing Policy is to be implemented where suspicions of fraud or corruption have been raised and is supplemented by relevant Golen Boots Uganda policies.

#### **Purpose:**

This Anti-Fraud & Whistle Blowing Policy applies to all Golen Boots Uganda staff, volunteers and interns. It serves as acknowledgement of values and key policies that guide desirable behavior in Golen Boots Uganda. All Golen Boots Uganda employees, volunteers and interns are required to be aware of this policy and to sign as their commitment to observe the provisions herein.

#### **Golden Boots Uganda values and supporting behaviours**

I will strive to live by the following values and supporting behaviour:

- **Accountability:** We are answerable to all our stakeholders.
- **Transparency:** We openly engage all stakeholders at different levels in our work.
- **Creativity and Innovative Programmes:** We develop and embrace new ideas into our programming.
- **Team Work:** Golen Boots Uganda staff work as a team

**I confirm that I have received, read and understood Golen Boots Uganda's Anti-Fraud and Whistle Blowing Policy as well as any other relevant guidelines that have been provided to me. I will strive to role model Golen Boots Uganda policies and values and I will abide by Golen Boots Uganda principles.**

## **CHAPTER 2:**

### **2.1 DEFINITION AND CATEGORIES OF FRAUD**

#### **2.1 Definition**

**Fraud** in this Anti-Fraud Policy & Whistle Blowing Policy is defined as **(a)** the use of deception with the intention of pursuing personal interests and causing loss to the proper interests of the institute **(b)** the illegitimate pursuit of inappropriate interests for personal gain, and **(c)** the intentional distortion of financial statements or other records by persons internal or external to the institute which is carried out to conceal misappropriation of assets or personal gain.

**“Whistle blowing”** means the disclosure internally and externally by staff or the provision of certain information by a third party which they have come across in the course of their duties.

#### **2.2 Examples of Fraud and Fraudulent Behaviour**

Some examples of fraud or fraudulent behaviour include:

- Misappropriation of assets, embezzlement and theft;
- Payment or receipt of bribes, kickbacks or other inappropriate payments;
- Participation in fraudulent transactions;
- Deceptive, misleading or false statements about corporate transactions;
- Forgery or alteration of accounting record or vouchers;
- Failing to keep confidential trade secrets of the Organization
- Non-disclosure of material information needed for an informed decision; and
- Other fraud behaviors causing loss Golen Boots Uganda’s interests.

This is not an exhaustive list. If you are in doubt about the seriousness of your concern; advice and guidance can be sought from the Human Resource Unit, the Founder or Golen Boots Uganda’s Disciplinary Committee.

## **CHAPTER 3:**

### **3.1 OVERSIGHT AND RESPONSIBILITIES**

The HR unit through the Disciplinary Committee shall have the primary responsibility for preventing, monitoring and rectifying fraud and potentially fraudulent behaviour. The Supervisors or HR officer shall establish, implement and monitor procedures and controls designed to assess, prevent and remediate fraud and fraudulent behaviour and issue periodic reports on the effectiveness of the implementation of this Anti-Fraud & Whistle Blowing Policy. All affiliates and departments of Golen Boots Uganda shall implement the procedures and controls developed by the management and periodically issue reports regarding the implementation of this Anti-Fraud & Whistle Blowing policy to the Disciplinary Committee which shall then issue a comprehensive report of the implementation and effectiveness of this Anti-Fraud Policy.

## **CHAPTER 4:**

### **4.1 PREVENTION AND CONTROL OF FRAUD**

Supervisors in each Department shall develop a corporate culture of honesty and integrity, assess the risk of fraud arising in the normal business operations of each Department/ unit, establish controls and procedures designed to eliminate the likelihood of fraud and to receive, investigate, report and recommend a remedial course of action in respect to suspected or voiced concerns of fraud or fraudulent behaviour. Managers and Supervisors at all levels shall promote a regular corporate culture of honesty and integrity through the following actions and activities:

- a) All Golen Boots Uganda's employees at all levels shall lead by example by strictly complying with this Anti-Fraud Policy
- b) Managers and Supervisors at all levels shall regularly communicate Golen Boots Uganda's message of honesty and integrity with employees through the Human Resource Manual and other written and verbal presentations of the principles underlying this Anti-Fraud Policy;
- c) HR Unit shall conduct periodic meetings to ensure employees attend trainings regarding business ethics and the related laws and regulations;
- d) Managers and Supervisors at all levels shall notify all direct or indirect interest parties, including external parties (customers, suppliers, supervision authorities and shareholders) regarding this Anti-Fraud Policy and the obligation of the employees to comply therewith;
- e) Employees at all levels shall notify external third parties of the opportunity and procedures for anonymously reporting wrongdoings and dishonest behaviour;

- f) In connection with Golen Boots Uganda’s annual overall risk management assessment process, Managers and Supervisors at all levels shall identify and assess the importance and possibility of fraud risk at entity level in each department. The assessment should include a report disclosing any inaccuracies or misrepresentations in Golen Boots Uganda’s financial reports, incidents involving embezzlement of assets, improper income or expenditures and a fraud risk assessment in respect of SMT and the BOD.
- g) Periodic reports shall be issued by the directors and Supervisors of each Department to the HR unit which shall then issue to the Disciplinary Committee regarding the operations of this Anti-Fraud Policy within each Department
- h) Managers and Supervisors at all levels shall establish control procedures to reduce the potential occurrence of fraud through protective approval, authorization and audit checks, segregation of duties, periodic compliance reviews and similar prophylactic measures.
- i) The HR Unit shall perform customary background checks (education, work experience and criminal records) for individuals being considered for employment or for promotion to positions of trust. Formal written documents for background checks shall be retained and filed in employee’s record

## **CHAPTER 5:**

### **51. REPORTING FRAUD OR FRAUDULENT BEHAVIOUR**

- 1) The HR unit, shall establish and maintain reliable communications channels (telephone hotlines, e-mail and mail) allowing for the anonymous reporting of actual or suspected instances of fraud or fraudulent behaviour or any of its employees, representatives or advisors. Contact information for the various channels of communication shall be publicized so that actual or suspected cases of fraud or fraudulent behaviour and violation of business ethics can be reported.
- 2) Complaints and concerns relating to instances of actual or suspected instances of fraud or fraudulent behaviour or questionable accounting, internal control or auditing matters shall be reportable through email [concerns@goldenbootsug.org](mailto:concerns@goldenbootsug.org) that will only be accessed by the HR, CEO or Board chair.
- 3) The HR unit shall promptly investigate alleged and/or reported instances of fraud or fraudulent behaviour. If any senior management member is involved in the alleged and/or reported instances of fraud or fraudulent behaviour, a disciplinary committee shall conduct an investigation and shall report directly to the CEO or Board of Directors (BOD).
- 4) Quarterly reports shall be issued by the CEO to the BOD regarding the nature and status of any complaints and/or investigations involving fraud or fraudulent behaviour. Such reports shall be retained and made available in accordance with the customary document retention policies.

Field Code Changed

## **CHAPTER 6:**

### **6.1 THE FINANCE & ADMINISTRATION DEPARTMENT AND ITS FUNCTION**

1) The Finance & Administration department which will take leadership in implementation and execution of this Anti-Fraud Policy. Among other things, the team shall:

- ✓ Organize and assist each of the staff with an annual fraud risk assessment for each department
- ✓ Perform an independent anti-fraud assessment on each Department;
- ✓ Review and assess the establishment and operation of this Anti-Fraud Policy;
- ✓ Receive, assess, investigate and resolve complaints and/or reports of alleged fraud or fraudulent behaviour with disciplinary committee.
- ✓ Review and assess reports from the internal auditors, which shall be issued on a regular basis; and
- ✓ Implement, execute and oversee the operation of the policies and procedures contained in the Anti-Fraud Policy.

2) Annual reports shall be issued by the Founding CEO to the BOD regarding the implementation and effectiveness of this Anti-Fraud Policy. Such reports shall be retained and made available in accordance with the Golen Boots Uganda document retention policies.



## CHAPTER 7:

### 7.1 GUIDANCE AND SUPERVISION FOR ANTI-FRAUD

- 1) Adequate monetary and human resources shall be committed to implement and maintain the policies and procedures articulated in this Anti-Fraud Policy.
- 2) The annual report of the Management to the BOD shall address the following:
  - Measures taken during the preceding year by Management to implement the policies and procedures in this Anti-Fraud Policy;
  - The effectiveness of anti-fraud procedures and control policies, including the identification of fraud risk;
  - The possibility of management override of controls, or other inappropriate influences over the financial reporting process;
  - The status of investigations into alleged fraud and fraudulent behaviour;
  - Review account policies and procedures utilized to detect and eliminate fraud and fraudulent behaviour in financial reporting; and
  - Review significant non-recurring transactions and related party transactions.

## CHAPTER 8:

### 8.1 WHISTLEBLOWING

1. **General Policy.** The decision to report a concern about suspected fraud or fraudulent behaviour can be a difficult one to make. Employees are often the first to realize that there is something seriously wrong within the organization. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to Golden Boots Uganda. They may also fear reprisals, harassment or victimization. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion. This encourages and enables employees, staff and external parties to raise serious concerns within the organization rather than overlooking a problem or blowing the whistle to the media or other external bodies.
2. **Confidentiality.** Golden Boots Uganda will do its best to protect an individual's identity when he or she raises a concern suspicion of breach of this policy or reports any fraud case. However, the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence.
3. **Anonymous Allegations.** Individuals are encouraged to put their names to allegations. Concerns expressed anonymously are much less powerful, but they will be considered and investigated at the discretion of Golden Boots Uganda Management. In exercising this discretion, the factors to be taken into account include: the seriousness of the issues raised; the credibility of the concern; and the likelihood of confirming the allegation from attributable sources.
4. **Untrue Allegations.** If an allegation is made in good faith, no action will be taken against the originator. If, however, individuals make malicious and false allegations, action may be considered against the individual making the allegation.

5. **Public Actions.** Golen Boots Uganda encourages members of the public who suspect fraud and corruption to contact the Human Resources Unit, or CEO.
6. For issues raised by employees or members of the public, the action taken will depend on the nature of the concern. The matters raised may be investigated internally or be referred to the appropriate authorities.
7. Within 5 working days of a concern being received, the complainant will receive a letter acknowledging that the concern has been received, indicating that the matter will be addressed, giving an estimate of how long it will take to provide a final response and telling them whether any further investigations will take place.
- 8 **Internal Report.** A written report regarding an investigation into an allegation of fraud or fraudulent behaviour shall be produced by the Chairperson Disciplinary Committee.
- 9 **Remedial Action.** If, after an investigation into the alleged fraud or fraudulent behaviour, it is determined that the allegation have merit or are materially true, Golen Boots Uganda reserves the right to take all appropriate actions including terminating the employment of any perpetrators, reporting the fraud or fraudulent activities to appropriate government authorities and pursuing legal actions, both civil and criminal, against the perpetrator.

#### **9.1 APPLICABLE SCOPE**

This policy applies to Golen Boots Uganda staff, BOD, partners, clients, suppliers and all Golen Boots Uganda affiliates.

#### **10.1 APPROVAL AND MODIFICATION OF THE POLICY**

This Anti-Fraud and whistle Blowing Policy has been approved by the Founding Director signed here under shall be reviewed and modified after 5 years or from time to time as need be by the Founder or Board of Directors with support from the Management.

Approved by Management

#### **Golden Boots Uganda (GoBU)**

Plot 05 Vineyard Close  
Kimbejja, Kyaliwajjala A village, Kira Municipality, Wakiso district.  
Tel: +256 706 701 558, **WhatsApp:** +256 762833864  
[info@goldenbootsug.org](mailto:info@goldenbootsug.org)  
<https://www.goldenbootsug.org>