



AfricaRice

Policy on Anti-Fraud, Anti-Bribery and Anti-Corruption

Version 2

Effective Date: 10 June 2026

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Document Management

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Related Policies and Procedures	• Code of Ethics and Business Conduct for Personnel. • Policy on Whistleblowing and Protection from Retaliation • Staff Management Policy • Ethics & Business Conduct Escalation Framework • Manual of Procedures for General Services Staff • Internationally Recruited Staff Manual of Procedures • Conflict of Interest Policy • Anti-Money Laundering and Anti-Terrorist Financing Policy
History of versions	Version 2
Key points	This update incorporates clear definitions of Bribery and Prohibited Practices

1. Introduction & Purpose

- 1.1. The Africa Rice Center (AfricaRice) is responsible and accountable for the resources made available to the Center to enable it to pursue its vision to sustainably improve food and nutrition security for a healthy and prosperous Africa and its mission to deliver rice-based innovations and transform rice-based agri-food systems that contribute to the transformation of food, land and water systems in the face of climate change.
- 1.2. AfricaRice recognizes that the prevention and mitigation of fraud and corruption in its activities and operations are core components of its research mandate and fiduciary duties. The Center does not tolerate the diversion or waste of its resources through the practices defined in paragraph 3 below.
- 1.3. This policy is designed to define fraudulent and corrupt activities, encourage prevention by increasing awareness, define standards of personal conduct, define the responsibilities at different levels, promote and understand methods of detection, and identify a clear pathway for the investigation and reporting of fraud and corruption.
- 1.4. The objective of this policy is to establish the general principles, responsibilities and procedures to be applied by AfricaRice in preventing and addressing prohibited practices in its activities and operations

2. Scope

- 2.1. This is a Centre-wide Policy applies to all AfricaRice staff, temporary staff, consultants, trainees, interns, and students. Third parties, including contractors, vendors, service providers, and partners are expected to adhere to the standards set out herein.
- 2.2. This policy applies equally to members of the Board of Trustees (BoT)

3. Definitions

- 3.1. **Fraud:** A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents as well as acts, omission or deliberate interpretation that causes, enables, or contributes to the loss in proper use or unjustified reduction of AfricaRice assets or resources. This includes identity theft, financial fraud, online scams, and embezzlement. The deliberate changing of financial statements or other records by either; a member of the public, someone who works or is a volunteer for AfricaRice. Fraud pertains to acts which aim to obtain an undue material or moral advantage by deliberately circumventing AfricaRice' internal policies and procedures and applicable public laws. The criminal act is an attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud. This includes identity theft, financial fraud, online scams, and embezzlement
- 3.2. **Bribery:** is an offer or promise or receipt of any gift or other advantage to include or reward behaviors, which is dishonest, unethical and illegal. It also includes giving, demand, acceptance, solicitation or any thereof, whether direct or indirect, influencing someone's behaviors in the discharge of their duties: -
- 3.3. **Corruption:** means and includes misuse or abuse or intent to abuse or misuse entrusted power or use of or intent to use any wrongful design, either directly or indirectly, to acquire or cause to acquire or secure any benefit or advantage including pecuniary advantage, for oneself or the other.
- 3.4. **Prohibited practices:** the following are prohibited practices when engaged in connection with AfricaRice' managed operations or activities: -
 - 3.4.1. **Corrupt practices:** is the offering, giving, receiving or soliciting, directly or indirectly, of anything of value in order to improperly influence the actions of another party.

- 3.4.2. **Fraudulent practices:** is any act or omission, including a misrepresentation that knowingly or recklessly misleads, or attempts to mislead, a party in order to obtain financial or other benefit or to avoid an obligation.
- 3.4.3. **Collusive practices:** is an arrangement between two or more parties designed to achieve an improper purpose, including improperly influencing the actions of another party.
- 3.4.4. **Coercive practices:** is impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to improperly influence the actions of that or another party.
- 3.4.5. **Obstructive practices:**
 - 3.4.5.1. deliberately destroying, falsifying, altering or concealing evidence that may be material to an investigation by AfricaRice or making false statements to investigators to materially impede an investigation by AfricaRice
 - 3.4.5.2. threatening, harassing or intimidating any party to prevent that party from disclosing its knowledge of matters relevant to an investigation by AfricaRice or from pursuing such an investigation
 - 3.4.5.3. the commission of any act intended to materially impede the exercise of AfricaRice' contractual rights of audit, inspection and access to information
- 3.5. **Red flag:** is a symptom of fraud. It can be defined as a condition or change of attitude, behavior which is directly attributable to dishonest or fraudulent activity. It may result from fraud itself or from the attempt to conceal the fraud.
- 3.6. **Theft:** dishonestly acquiring, using or disposing of physical or intellectual property belonging to AfricaRice or to individual members of the organization.
- 3.7. **Misuse of Assets:** deliberately misusing materials or equipment belonging to AfricaRice for personal financial or material benefit.
- 3.8. **Abuse of position:** exploiting a position of authority and trust within AfricaRice for personal, financial or material benefit. Making decisions that are not fully in the interest of AfricaRice.
- 3.9. **Conflict of Interest:** Situations where personal interests interfere with organizational duties
- 3.10. **Staff:** means a person appointed by AfricaRice and governed by Staff Management Policy.

4. Policy Statements

- 4.1. AfricaRice has a zero-tolerance principle to fraud, bribery and corruption and is committed to an effective approach to the management of the risk of fraud, bribery and corruption in its activities and in all operations managed directly by the center.
- 4.2. Under no circumstance shall any provision be made, funds set aside, or accounts created for the purposes of facilitating the payment or receipt of a bribe.
- 4.3. Making an untrue/false or misleading representation with the intention of making a gain for oneself is strictly forbidden, so is receiving money while being aware of its nature.
- 4.4. AfricaRice endeavours to ensure that individuals and entities that help to prevent or report, in good faith, allegations of fraud, bribery, corruption and/or prohibited practices are protected against retaliation and to protect individuals and entities that are the subject of unfair or malicious allegations

5. Measures to Prevent and Detect Fraud, Bribery and Corruption

- 5.1. AfricaRice is committed to prevent, mitigate combat fraud, bribery and prohibited practices in its operations and activities. This will be achieved by raising awareness on the risk of fraud, bribery and corruption and robust mitigating measures within AfricaRice. Compliance with internal control procedures in all activities and levels, management day-to-day monitoring and approval process. Reporting, identification and investigation of all fraud, bribery and corruption allegations

- 5.2. Risk Management and Internal Control Systems:** AfricaRice internal control system and approach to risk management seek to ensure that appropriate procedures are in place to prevent, detect and mitigate the risks of fraud, bribery and corruption. This contributes to:
- 5.2.1.** Identifying areas of operations prone to fraudulent, corrupt bribery and prohibited practices.
 - 5.2.2.** Embedment of an effective risk management process, monitoring risks on an ongoing basis and regularly assessing the effectiveness of the internal controls processes.
 - 5.2.3.** Raising staff awareness on the prevention, detection and reporting control systems over fraudulent, corrupt and prohibited practices.
 - 5.2.4.** Cultivating an organization-wide culture of compliance which is fraud, bribery and corruption, risk-mitigated.
 - 5.2.5.** Reporting fraud cases and maintaining records of fraudulent and corruptive cases and red flags at AfricaRice in order to study the pattern and trends.
- 5.3. Internal Audit:** AfricaRice has established these functions that will ensure that the center's risk management processes are adequate, and that internal controls function in a reliable manner to ensure the efficient use and adequate protection of its assets and resources.
- 5.4. External Audit:** AfricaRice Board of Trustees appoints External Auditors to the Centre. The appointments are rotated on a regular basis as per industry's best practice. The External Auditor is under the obligation to report any cases of fraud or presumptive fraud or wasteful or improper expenditure of AfricaRice' resources or other assets, thereby contributing to the objectives of this Policy.
- 5.5.** Communication channels and framework designed to ensure that this policy is communicated to AfricaRice staff and non-staff personnel, vendors, service providers, partners and collaborators and that it is reflected in procurement documents and contracts relating to AfricaRice' activities and operations.
- 5.6.** Measures relating to the receipt of confidential complaints, whistle-blower protection, investigations, sanctions and disciplinary measures which are designed to ensure that prohibited practices can be properly reported and addressed.
- 5.7.** Measures designed to ensure that AfricaRice can report individuals and entities that have been found to have engaged in prohibited practices to other CGIAR Centers and partners which may be exposed to similar actions by the same individuals and entities and to local authorities in cases where local laws may have been violated.
- 5.8.** Establish clear guidelines and procedures in place for report, investigations, and sanctioning of fraud, bribery, corruption and prohibited practices allegations.

6. Training, Awareness & Reporting

- 6.1.** AfricaRice will raise awareness through seminars and induction programs of this Policy and the related Guidelines. Refresher training on this Policy will also be conducted regularly.
- 6.2. Mandatory Reporting:** The Board of Trustees, all AfricaRice Staff, Hosted Institution Staff, Consultant, Interns, Vendors, Partners, Collaborators, Service Providers and other Stakeholders shall report in good faith fraud, bribery and corruption allegations, concerns or suspicions or retaliation related to this policy, that they have witnessed, or know of, by other Center's representatives, or by people employed by or working for hosted institutions or the community within which the Center operates.

- 6.3. Ensure a designated confidential and secure e-mail address for the receipt of allegations of fraud, bribery, corruption, and prohibited practices is available on the Center' website. In the event of uncertainty as to whether or not an act or omission constitutes a prohibited practice, the designated confidential and secure e-mail address may be used to seek guidance.

7. Roles and Responsibilities

7.1. Board of Trustees

- 7.1.1. Review and approve changes and revisions to this policy.
- 7.1.2. Champion an ethical organizational culture by actively embracing this Policy
- 7.1.3. Provide oversight for compliance with this Policy

7.2. Director General

- 7.2.1. Review, approve and implement the provisions of this Policy.
- 7.2.2. Championing an ethical organizational culture by actively embracing this Policy, setting the tone, and leading by example.
- 7.2.3. Approve the engagement of external investigator where required.
- 7.2.4. Ensure that all Staff have access to, are familiar with, and know their responsibilities pursuant to this Policy.
- 7.2.5. Ensure appropriate measures are in place to protect from reprisal/retaliation anyone who reports wrongdoings and makes a good faith report.

7.3. Executive Management Committee

- 7.3.1. Review and recommend updates and revisions to this policy.
- 7.3.2. Championing an ethical organizational culture by actively embracing this Policy, setting the tone, and leading by example.
- 7.3.3. Support the implementation of this Policy.

7.4. Program Leaders/Country Managers/Heads of Units

- 7.4.1. Remains vigilant in ensuring their staff compliance with this policy.
- 7.4.2. Immediately report any breach of the policy or suspicion of prohibited transactions to EMC or the Internal Audit Unit.
- 7.4.3. Ensures that new partners and suppliers provide assurance of non-involvement in money laundering and terrorist financing.
- 7.4.4. Ensures that staff receive all information relating to this policy as communicated by the Ethics/Legal Office or AfricaRice management and effectively.
- 7.4.5. Ensures their staff are sufficiently aware on how to comply with relevant anti-money laundering and anti-terrorist financing laws, regulations, policies and procedures in their relevant jurisdictions.

7.5. Ethics/Legal Office

- 7.5.1. Ensure implementation and adherence to this policy
- 7.5.2. Review and prepare changes, updates and revisions to this policy.
- 7.5.3. Organize Regular campaigns across AfricaRice promote awareness of this Policy.
- 7.5.4. Collaborate with the law enforcement agencies, where necessary.
- 7.5.5. If deemed appropriate, vet new partners and suppliers and confirms if they are cleared up for compliance purposes.
- 7.5.6. Ensure that proper fraud, bribery, corruption & prohibited practices allegations records are maintained and up to date.
- 7.5.7. Collaborates in the development and implementation of training programs for staff.

7.6. Human Resources Unit

- 7.6.1.** Ensures that appropriate background checks are carried out for all recruitment of staff.
- 7.6.2.** Follows up and takes appropriate action on indications or reports that staff are linked or involved in fraud, bribery, corruption and prohibited practices.
- 7.6.3.** Coordinate the development and implementation of appropriate training programs for staff, either with staff from the unit or with external consultants.

7.7. Internal Audit Unit

- 7.7.1.** Receives, investigates and reports on all allegations reported.
- 7.7.2.** Audits the Anti-fraud, Anti-bribery Anti-corruption and prohibited practices Processes and Procedure.
- 7.7.3.** Support the development and implementation of training programs for staff.

7.8. Staff

- 7.8.1.** Adhere to the provisions of this Policy.
- 7.8.2.** Take prompt action if they observe any breach or non-compliance to this Policy.
- 7.8.3.** Cooperate fully in any commissioned investigations.
- 7.8.4.** Actively Participate in training programs relating to this Policy.

8. Review.

- 8.1.** This policy will be reviewed every three years or earlier if required by the Ethics/Legal Office.
- 8.2.** Any changes made to the Policy will be presented to the Executive Management Committee (EMC) for endorsement and thereafter submitted to the Board of Trustees for approval.

9. Related Documentation

- 9.1.** Code of Ethics and Business Conduct for Personnel.
- 9.2.** Policy on Whistleblowing and Protection from Retaliation
- 9.3.** Staff Management Policy
- 9.4.** Ethics & Business Conduct Escalation Procedures
- 9.5.** Manual of Procedures for General Services Staff
- 9.6.** Internationally Recruited Staff Manual of Procedures
- 9.7.** Conflict of Interest Policy
- 9.8.** Anti-Money Laundering and Anti-Terrorist Financing Policy