

Southern Africa Philanthropy Foundation (SAPF)

Anti-Bribery and Corruption Policy

Presented for Board Approval

1. Policy Purpose

This policy affirms the Southern Africa Philanthropy Foundation's (SAPF) commitment to integrity, accountability, and ethical stewardship of its resources and reputation. It is designed to prevent, detect, and respond to any form of bribery or corruption within SAPF's operations, partnerships, and funded activities.

2. Alignment with Vision, Mission, and Values

SAPF exists to catalyse dynamic philanthropy for a just and inclusive society in Southern Africa. Our mission is to strengthen the nonprofit ecosystem through stewardship, strategic support, and collaborative engagement. This policy reinforces our values of:

- **Integrity** in all relationships and decisions
- **Transparency** in the use and management of resources
- **Service** to communities with dignity and respect
- **Inclusion** in who we partner with and how we lead change
- **Shared Purpose** with those we fund, support, and serve

At its core, this policy upholds **stewardship** by ensuring that all entrusted resources are used appropriately and reputably, in a manner that safeguards those we serve and the integrity of our institution.

3. Scope of Application

This policy applies to:

- All SAPF board members, employees, contractors, consultants, volunteers, and interns.
- Any individual or organisation acting on behalf of SAPF, including partners, vendors, grantees, and funders.

4. Policy Statements

4.1 Zero Tolerance

SAPF has a zero-tolerance approach to bribery and corruption, whether involving public officials, private entities, or community actors.

4.2 Prohibited Conduct

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Board of Directors

Jo-Ann Pohl (Chairperson), Gill Bates, Danni Dixon, Joanne Donald, Luyanda Matlala, Kgomotso Mufamadi, Ziaad Suleman

BBEE Status: Exempted Micro Enterprise; Level 4 Contributor, Sco Beneficiary Analysis: 91%, 100% SED Recognition

The following are strictly prohibited:

Offering, giving, or receiving bribes in any form

Manipulating procurement, hiring, or grant decisions for personal gain

Diverting funds or assets for unauthorised use

Accepting gifts or hospitality that may create a real or perceived conflict of interest

5. Gifts and Hospitality Guidelines

Gifts of nominal value may be accepted only when:

- They are culturally appropriate and infrequent
- They do not influence or appear to influence a decision
- They are declared in SAPF's Gift Register

All gifts and hospitality must be reported to the Finance and Operations Lead and reviewed quarterly.

6. Due Diligence and Risk Management

SAPF will:

- Conduct due diligence on partners, vendors, and grantees
- Include anti-bribery and corruption clauses in contracts
- Assess corruption risks during project planning and implementation

7. Reporting and Whistleblowing Mechanisms

SAPF encourages staff and stakeholders to report suspected bribery or corruption through:

- Direct reporting to the CEO or Chair of the Board
- Use of a confidential, secure reporting mechanism (to be specified)
- Anonymous whistleblower channels where necessary

Retaliation against whistleblowers is strictly prohibited and will result in disciplinary action.

8. Monitoring, Training, and Enforcement

- Training on this policy will be mandatory for all SAPF staff and offered to partners.
- Compliance will be reviewed annually by the Audit & Risk Committee.
- Breaches may result in dismissal, termination of contracts, and legal proceedings.

9. Governance and Oversight 

The SAPF Board of Directors bears ultimate responsibility for the implementation and enforcement of this policy. The CEO will report annually on compliance, incidents, and recommended updates.

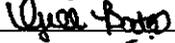
10. Policy Review

This policy shall be reviewed every two years or as needed in response to significant changes in regulatory requirements or operational context.

Approved by the SAPF Board of Directors

Date of Approval: 1st of April 2025.

Signature of Board Chair: _____

Signature of CEO: 

Next Review Date: 1st of April 2026.