

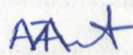
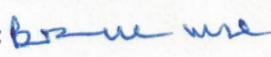


Meeting Point International

ANTI-FRAUD AND ANTI-CORRUPTION POLICY

Meeting Point International (MPI)

2026

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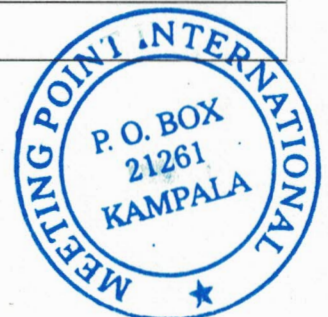




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1. INTRODUCTION

Founded by Rose Busingye in 1992, Meeting Point International (MPI) is a Ugandan non-governmental organization working with women, men, youth and children from the slums of Kampala, who are mainly affected and infected by HIV/AIDS.

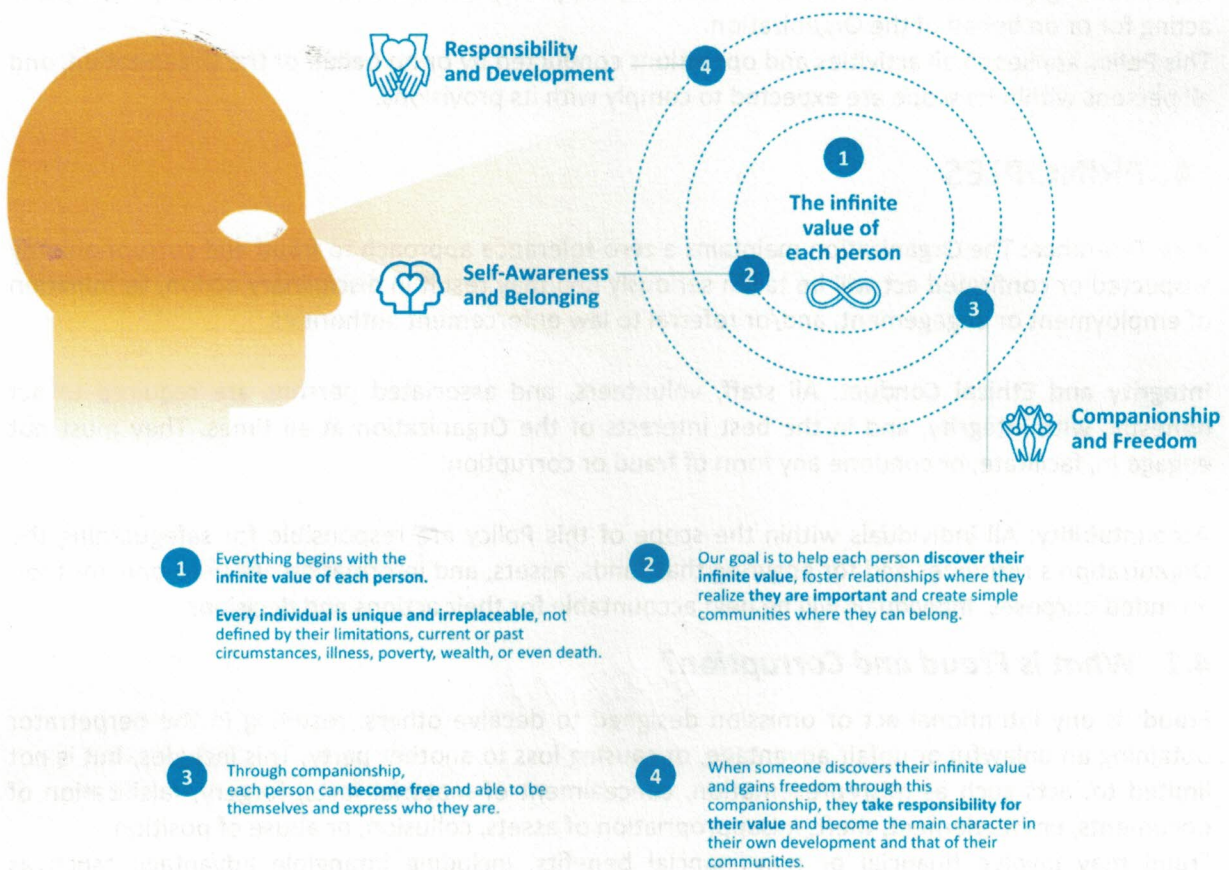
1.1 MPI's Vision

For every person to discover their infinite value and dignity, through a journey towards their own human development and that of their communities.

1.2 Our Mission

MPI aims at continuously accompanying every person and community, prioritizing victims of HIV/AIDS, promoting education at all levels and committing to poverty alleviation.

1.3 MPI's Method



1.4 Anti-Corruption Framework

This Policy establishes the Organization's framework for preventing, detecting, and responding to fraud and corruption. It reflects good governance practices and replaces any previous guidance on these matters.

2. PURPOSE

This policy sets out the responsibilities of managers, employees and volunteers in the event of fraud or corruption. The principles and definitions in this policy also extend to relationships Meeting Point International (MPI) has with Implementing partners and other organizations working with MPI. To ensure that MPI continues to have high standards of accountability, it is important that clear guidance is given to employees and volunteers on how fraud and suspected fraud is to be dealt with. This policy statement sets out the responsibilities of managers, employees and volunteers in the event of fraud or corruption.

3. SCOPE OF APPLICATION

This Policy applies to all employees and volunteers of the Organization, regardless of their role, seniority, or contractual status.

The principles and definitions set out in this Policy also extend to all individuals and entities with whom the Organization has a working relationship. This includes, without limitation, National Organizations, implementing partners, contractors, consultants, suppliers, and donors, as well as any third party acting for or on behalf of the Organization.

This Policy applies to all activities and operations conducted by or on behalf of the Organization, and all persons within its scope are expected to comply with its provisions.

4. PRINCIPLES

Zero Tolerance: The Organization maintains a zero-tolerance approach to fraud and corruption. Any suspected or confirmed act will be taken seriously and may result in disciplinary action, termination of employment or engagement, and/or referral to law enforcement authorities.

Integrity and Ethical Conduct: All staff, volunteers, and associated persons are required to act honestly, with integrity, and in the best interests of the Organization at all times. They must not engage in, facilitate, or condone any form of fraud or corruption.

Accountability: All individuals within the scope of this Policy are responsible for safeguarding the Organization's resources and for ensuring that funds, assets, and information are used only for their intended purposes. Individuals will be held accountable for their actions and decisions.

4.1 What is Fraud and Corruption?

Fraud: is any intentional act or omission designed to deceive others, resulting in the perpetrator obtaining an unlawful or unfair advantage, or causing loss to another party. This includes, but is not limited to, acts such as misrepresentation, concealment of material facts, forgery, falsification of documents, embezzlement, theft, misappropriation of assets, collusion, or abuse of position. Fraud may involve financial or non-financial benefits, including intangible advantages such as information, influence, or status.

Corruption: The abuse of entrusted power, position, or authority for private gain. This includes offering, giving, soliciting, or receiving any undue advantage, whether directly or indirectly, to influence the actions or decisions of an individual or organization.

Corruption may take various forms, including bribery, kickbacks, conflicts of interest, and improper use of resources or authority, and may involve financial or non-financial benefits, including intangible advantages.

5. PREVENTION, DETECTION, AND RESPONSE

MPI adopts a comprehensive approach to managing fraud and corruption risks through a cycle of prevention, detection, and response. **This Policy should be read in conjunction with the MPI Code of Conduct.**

MPI takes the most serious view of any attempt to commit fraud or corruption by staff, volunteers, contractors, and any persons acting on its behalf. Attempted acts are treated with the same seriousness as completed acts.

5.1 Prevention

MPI is committed to preventing fraud and corruption by promoting a culture of integrity, accountability, and transparency.

Measures include:

- Mandatory training programmes for all staff to increase awareness of fraud and corruption risks and to build skills for preventing and reporting such practices.
- Refresher training to be undertaken at least every three years.
- Ongoing, role-specific training tailored to enable personnel to identify and mitigate risks relevant to their responsibilities.
- Monitoring of training completion to ensure compliance.

5.2 Detection

MPI implements measures to detect fraud and corruption at an early stage. These include:

- Encouraging staff, volunteers, and associated persons to remain vigilant and report any suspected or actual instances of fraud or corruption.
- Oversight mechanisms, including internal controls and review processes.
- Independent review through external audit.
- The External Auditor is required to report any identified or suspected cases of fraud, presumptive fraud, or improper or wasteful expenditure of MPI's funds or assets.

5.3 Response

MPI will respond promptly and decisively to any suspected or confirmed cases of fraud or corruption:

- Any individual found to have engaged in fraud or corruption will be subject to disciplinary action, which may include termination of employment or contract.
- Where appropriate, cases may be referred to external authorities for investigation and possible criminal prosecution.
- MPI will take appropriate corrective actions to recover losses and strengthen controls.

6. RESPONSIBILITIES

MPI is committed to preventing fraud and corruption from occurring and developing an anti-fraud and anti-corruption culture.

To achieve this, MPI will:

- Develop and maintain effective controls to prevent fraud and corruption.
- Ensure that if fraud occurs, a vigorous and prompt investigation takes place.
- Take appropriate disciplinary and legal action in all cases, where justified.
- Take all appropriate and reasonable steps to recover any financial losses, and review systems and procedures to prevent similar fraud(s).

6.1 Managers' Responsibilities

The day to day responsibility for the prevention and detection of fraud rests with the office coordinators who are responsible for:

- Identifying the risks to which systems, operations and procedures are exposed.
- Developing and maintaining effective controls to prevent and detect fraud.
- Ensuring that controls are being complied with.

Office Coordinators are responsible for reporting all cases of fraud and corruption to the Executive Director.

6.2 Staff Responsibilities

All staff are responsible for:

- Acting with propriety in the use of MPI assets and resources.
- Conducting themselves in accordance with the principles set out in the MPI Code of Conduct.
- Alerting their line manager where they believe an opportunity for fraud or corruption exists.
- Reporting immediately to their line manager:
 - (a) any suspected or actual fraud or corruption;
 - (b) any suspicious acts or events that may give rise to suspicion of fraud or corruption.

If a staff member is unable or unwilling to report suspected fraud or corruption to their Office Coordinator, they should report the matter to a more senior manager (such as a Technical Advisor) or directly to the Executive Director. Where a staff member does not feel comfortable reporting through line management, or is not satisfied that their concerns have been adequately addressed, they should follow the procedures outlined in the MPI Whistleblowing Guidance.

All staff are required to cooperate fully with any investigations, including by providing relevant information and participating in interviews as requested.

6.3 Responsibilities of the Finance Manager

The Finance Manager is responsible for:

- Establishing and maintaining an internal control system designed to mitigate the risk of fraud and corruption.
- Ensuring the adequacy and effectiveness of these internal controls.

6.3.1 In collaboration with Office Coordinators

The Finance Manager shall:

- Ensure that fraud and corruption risks are properly identified and assessed by management.
- Assess whether the internal control framework is appropriately designed to address identified risks and is operating effectively.
- Ensure that appropriate arrangements are in place for the investigation of all suspected or alleged cases of fraud or corruption.
- Maintain a fraud and corruption register.
- Report all cases of fraud and corruption to the Executive Director or Technical Advisor and the Senior Accountant.
- Provide counter-fraud support and guidance to management to reduce exposure to fraud risks.

7. MONITORING AND REVIEW

MPI shall periodically review the implementation and effectiveness of this Policy to ensure that it remains relevant, effective, and aligned with organizational needs and applicable legal requirements.

All staff, volunteers, contractors, and associated persons are expected to comply with this Policy and contribute to maintaining a culture of integrity, accountability, and transparency within MPI.

ANTI-FRAUD AND ANTI-CORRUPTION POLICY ACKNOWLEDGMENT AND ACCEPTANCE FORM

I, (Full Name)
..... (Position/Role/Organization if applicable),
acknowledge receipt of the Meeting Point International (MPI)'s Anti-Fraud and Anti-Corruption Policy.
I confirm that I have read, understood, and accepted the Anti-Fraud and Anti-Corruption Policy as part
of my employment, collaboration, volunteer service, consultancy, partnership, or engagement with
Meeting Point International (MPI).

Name : _____
Signature : _____
Date : _____

A copy of the signed Anti-Fraud and Anti-Corruption Policy should be returned to the Administration
office or to this email: admin@meetingpoint-int.org