ELOHIM FOUNDATION

Creating Alternatives, Promoting Sustainable Development.

ANTI-BRIBERY AND CORRUPTION POLICY

Effective Date: October, 2012.
Review Date: September, 2017, 2022**.**
Approved by: Board of Trustees**.**

ADDRESS:

ABUJA OFFICE/HQ: BLK 5, Plot 458, Ibecheole Julius, Dutse Sangwari Layout, off Bwari Area Council. P. O. Box 12364 Garki Abuja. Telephone: 08088207940, 08037572517. Nigeria.

SULEJA MAIN OFFICE: No 13 Dabai Crescent, off Suleiman Baru Road, behind Federal Road Safety Office, Suleja Niger State. 08105508443.

OWERRI OFFICE: Suite 10/11, Anglican Diocesan Women Complex, Egbu, Owerri North, Imo State. Tel: +234-0803-3494865.

E-mail: info@elohimfoundation.org.ng , elohimfoundation@gmail.com

Web site: www.elohimfoundation.org.ng

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BACKGROUND:

Elohim Foundation was formerly known as The Carpenter's Foundation International, a non-for-profit development and humanitarian organisation founded on the 13th September, 2001 in Abuja –Nigeria. The foundation is the brainchild of Dr. Ibecheole, Julius a physically challenged Nigerian, set out to tackle the challenges of human family preservation through socio-economic intervention.

The Foundation was registered with Cooperate Affairs Commission as a non-for-profit organisation on the 29th April 2002 five years after it started operation in Egbu Owerri, Imo State on 27th of August, 1997. Following its registration, the foundation officially got inaugurated in Abuja on the 13th of September, 2001. And in 2006 its operational office in Niger state was established.

In 2005, 2010 and currently in 2024 Elohim Foundation has gone through strategic structural and program reviews by external consultant development firms with intent to strengthen its operational capacity, efficiency, productivity and impact in line with its broad goals and objectives while keeping in tune to emerging trends.

Elohim Foundation therefore is a system-based organisation with a history of best practices rooted through its dynamic operational policies and regulations, providing evidenced based services to a wide range of clients across Nigeria using dynamic strategic approaches such as partnerships, social movements, advocacy, right based approach, inclusivity, evidence based, research and conferencing.

GOAL

To contribute to the sustainability of the human community through eradication and impact mitigation of conflict and socio-economic challenges while promoting human capacity development.

VISION

Intact family for Sustainable human society.

MISSION

To provide intervention services that addresses the challenges of conflict and sustainable human society, through people centred approaches in both development and humanitarian setting.

ORGANISATIONAL RATIONALE:

a) That life in general is a costly gift of God, which need be preserved and cherished.

b) That as God's ambassadors on earth, we are called to complement creation by giving our all towards its sustenance for today and tomorrows generations

c) That human development is a broad band spectrum that requires the input of all sectors, as governments of nations cannot do it alone.

OUR VALUES

a) RESPECT: We respect the various traditions and loyalties of our co-worker, partners and beneficiaries.
b) EMPATHY: We identify as deeply as possible with people's hurts and concerns.
c) ACCOUNTABILITY & TRANSPARENCY: We spare no effect to being reliable, accurate and open in our operational
d) GENDER EQUITY: We recognise and encourage God given gifts and the acquired skills/ knowledge in both male and female.
e) NON-RACIAL, NON-DISCRIMINATORY: Respect for all Races and ethnic groups.
f) SELFLESS SERVICE: Determination and boldness to services requiring us to be creative, radical, excellent and attractive without being ostentatious and sensational.

OBJECTIVES

1. **Conflict Mitigation & Peace Building:** To promote an enduring family life style and peaceful co-existence among people of all races, tribe, ethnicity, sect, geographic location, and religion within the human community as a tool for sustainable human development and society.
2. **Public Health:** To provide community based public health intervention: health promotion and point of care services, palliative healthcare services while promoting universal access to healthcare for the general public and people with special needs.
3. **Child Development & Gender Programming:** To provide child focused family-based interventions in promotion of a safe environment for the comprehensive development and wellbeing of children, in households; while promoting gender integrations and protection (GBV/GHR) and anti-human trafficking.
4. **Environmental Protection & Agriculture:** To promote green practices towards the protection, sustainability of the earth environment, environmental safety and support smart agriculture while mitigating disaster impact and providing recovery services.

5. **Research and innovation:** To contribute to the sustainability of the human race and society through research and innovation while advancing capacity building through trainings and conferencing, in its fields of operation.

SERVICES

- **Peace building and conflict mitigation**: Public orientation on peace building and conflict resolution, community peace dialogue engagements, advocacy, provision of psychosocial support to families and communities affected by conflict, reintegration programming.

- **Community and Public Health Services**: HIV/AIDS TB, Viral Hepatis, Malaria (Prevention education, testing and diagnosis, treatment and referral), Maternal and infant Morbidity/Mortality reduction programming (Nutrition, Immunization, health education, vitamin supplementation, deworming, wash and family planning, adolescent sexual and reproductive health)

- **Environment/ Agriculture:** Environment protection, Forestation, Biodiversity protection, Agroforestry, Climate change adaptation research and programming, Environmental safety, Disaster impact mitigation and recovery. Promoting SMART Agricultural practices for food security and nutrition while upholding agricultural research and value chain promotion.

- **Child Development & Gender Programming:** Child protection, gender rights and protection (GBV/GHR), human trafficking, child abuse, legal child adoption programming, care for orphans and vulnerable children services, and irregular migration while mitigating its impact among victims in promotion of the rights and dignity of human life. Training workshops, skill acquisition program, VSLA & financial literacy education aimed at improving the socio-economic livelihood status of the rural and urban poor.

- **Research and innovation:** Applied, basic research, impact evaluation, trainings, seminars, webinar and conferences.

Standard Operating Approaches:

- Partnership/Collaborations.
- Policy Advocacy & Accountability.
- Capacity Building, Research & Conferences.
- Right base approach

- Gender Integration & Social inclusion
- Participatory Monitoring, Evaluation, Adaptation and Learning

PROGRAMME BENEFICIARIES

Communities, victims of disaster, children, women of reproductive age, adolescent youths, single female parents, widows, marginalised persons (Physically challenged persons).

GOVERNANCE STRUCTURE

Elohim Foundation structure consist of 4 distinct but inter related organs/strata namely: (1) Board of Trustees (BoT), the Office of the (2) Chief Executive Officer/Founder, the (3) Management Board, and the (4) Volunteer Team. The Management Board (MB) is led by the Project Director and supported by 4 departmental managers: the Operations Manager, the Programmes Manager, the Grants/Assets Manager and the Research & Data Management Manager. The MB is supported by the Team Leads/Senior Program/Technical Officers, the Officers, intermediate/Junior Staff. The Project/Community Volunteers are the life-line/foot soldiers of the Foundation. Communication within this structure is both vertical and horizontal within and across organs, departments and personnel.

The BoT is the highest decision organ of the foundation and is vested with the responsibility of issuing institutional ratification & approvals for policy tools, strategic & annual plans and budgets, and have over-sight function of monitoring the overall operations of the management team lead by the Project Director. The MB is responsible for the day-to-day running of the foundation's operations and programmes through the support of the various coordinating programme/operational units that is led by a Senior Program/Technical Officers or Team leaders across the units within the 4 departments. Each of this unit is tasked with implementing the operations and programmes of the foundation, they are the field officers. In-line with the operational policy of Elohim Foundation, each of the organs in the structure is manned by classified category of professional skilled personnel with adequate experience suited for their task.

Membership to the BoT is through nomination by existing members and the management board of the foundation through an open nomination circular while the composition of the MB and the coordinating programme unit is by employment. Whereas the Volunteers engagement is project specific and voluntary. The BoT meets twice a year while the MB meets monthly and the unit teams meets weekly.

Elohim Foundation board is composed of seasoned professionals from diverse field. Its team of board members are a group of 7 passionate and pragmatic trustees, with each as members of a

technical working group within the four (4) departments of the foundation which are namely: TWG on Programmes, TWG on Finance, TWG on Research and Data Management and TWG on Human Resource & Administration. Since registration with CAC in 2002, the Board have been reconstituted twice, first in 2010 and now in 2024 still under process with Cooperate Affairs Commission (CAC).

Policy Statement

Elohim Foundation is committed to conducting all its operations ethically, transparently, and in full compliance with applicable laws and regulations on anti-bribery and corruption. The Foundation maintains a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly, and with integrity in all its relationships and activities.

Purpose of the Policy

This policy aims to:

- Prevent, detect, and respond to bribery and corruption.
- Ensure staff and representatives understand and uphold the Foundation's position.
- Comply with local and international anti-corruption laws (e.g., Nigerian laws, UK Bribery Act, U.S. FCPA where applicable).
- Protect Elohim Foundation's reputation and trustworthiness.

Scope of the Policy

This policy applies to:

- All employees, board members, interns, and volunteers.
- Partners, consultants, contractors, and suppliers.
- Anyone acting on behalf of the Foundation in Nigeria or abroad

Definitions

- **Bribery** is offering, giving, receiving, or soliciting anything of value to influence the actions of an official or other person in discharge of a public or legal duty.
- **Corruption** refers to abuse of entrusted power for private gain, including embezzlement, fraud, extortion, nepotism, and facilitation payments.

Prohibited Practices: Elohim Foundation prohibits:

- Offering or accepting bribes in any form (cash, gifts, favors, kickbacks).
- Facilitation payments, even if customary.
- Political donations intended to secure advantage.
- Nepotism in hiring or procurement.
- False reporting of financials or activities.
- Misuse of funds for unauthorized or private purposes.

Gifts and Hospitality

- Modest and infrequent hospitality is permitted only if it is transparent, proportionate, and not intended to influence.
- All gifts above NGN 20,000 must be declared.
- Offering or accepting gifts from government officials or donors is discouraged and must be approved by senior management.

Responsibilities

- **Board of Trustees:** Approves and oversees compliance with the policy.
- **Executive Director:** Ensures implementation, reviews reports, and enforces disciplinary actions.
- **Staff & Representatives:** Must understand and comply with the policy and report breaches.
- **Finance/Admin Unit:** Tracks expenditures and flags suspicious activity

Reporting Violations

- Reports can be made to the **Chief Executive Officer** or anonymously via the **Whistleblower Channel: whistleblowing@elohimfoundation.org.ng**
- All reports will be treated confidentially and investigated promptly.
- No retaliatory actions will be tolerated against whistleblowers

Consequences of Breach: Violation of this policy may result in:

- Disciplinary action, including dismissal.
- Contract termination for partners or suppliers.
- Criminal investigation and prosecution.

Training and Awareness

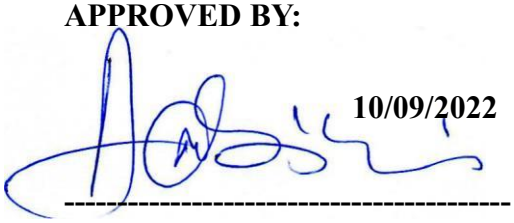
All staff and representatives will:

- Receive training on anti-bribery and corruption on induction and annually.
- Sign an annual Code of Conduct compliance declaration.
- Have access to updates and refresher training.

Monitoring and Review

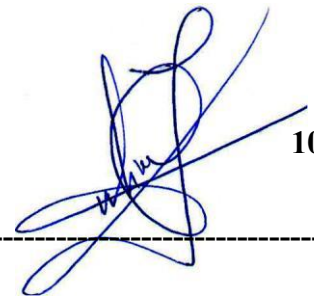
- The policy will be reviewed annually or when legal requirements change.
- Internal audits will assess compliance.
- Results will be reported to the Board and relevant stakeholders.

APPROVED BY:



10/09/2022

Mrs. Ngozi Obilor
President Board of Trustees.



10/09/2022

Dr. Ibecheole, Julius PMD. NES.
Chief Executive Officer/Founder