
Sugar Insurance Fund Board

Anti-Corruption Policy

OUR VISION

To always have a community of sugar producers happily engaged in a flourishing cane producing business.

OUR MISSION

The mission of the Sugar Insurance Fund Board is to be a premier provider of sugar insurance service in the Republic of Mauritius guided by discipline in underwriting and claims, maintaining strict financial standards, excellent customer service and prudent expense management.

1.0 Introduction

The Sugar Insurance Fund Board (SIFB) recognises that the risk of corruption is present and corruption may occur in any organisation. As such, the SIFB is committed to maintain the highest level of integrity in the conduct of its affairs through the adoption of corruption prevention strategies in the organisation.

This anti-corruption policy sets out the full commitment of the Sugar Insurance Fund Board for the deterrence and detection of corruption and for adherence to a culture of integrity.

2.0 Statement of Intent

The SIFB will not tolerate corruption in the administration of its responsibilities, whether from inside or outside. It expects the highest standards of conduct from staff, Board members and those who have dealings with the Sugar Insurance Fund Board including stakeholders and the general public.

3.0 Policy Statement

The SIFB is committed to promoting and adhering to the highest standards of probity, transparency and accountability in the operations and management of the organisation. Through this policy the organisation engages itself to fully and unequivocally adopt a zero-tolerance stance towards corruption and other malpractices and shall ensure compliance with the anti-corruption legislation.

For the purpose of ensuring sound implementation of this policy, the Sugar Insurance Fund Board will ensure that:

-
- Officers are aware of the anti-corruption policy and that it is applied to all undertakings.
 - Adequate controls to counteract corruption are known and used within the organisation.
 - There are clear procedures and systems for handling suspected cases of corruption.
 - Stakeholders are aware of the organisation's anti-corruption policy.

The main objective of this anti-corruption policy is to strengthen and sustain an integrity culture and transparency within the organisation, achievable through:

- The setting-up of effective processes characterised by broad participation and transparency.
- Regular evaluation of corruption risks, systems and procedures.
- Ensuring that projects have clearly formulated goals, expected results as well as monitoring and follow-ups.
- Learning from experiences and continually improving organisational performance and the corporate image.

4.0 Scope and Applicability

This policy covers measures and practices of the Sugar Insurance Fund Board on preventing and combating corrupt, fraudulent, collusive or coercive practices in its activities and operations. This policy applies to Board members, management, employees as well as, consultants, suppliers, contractors, outside agencies doing business, and or any other parties having a business relationship with the Sugar Insurance Fund Board.

5.0 Definitions

For the purpose of this policy, corruption is defined as per section 2 of the Prevention of Corruption Act 2002, as amended.

"act of corruption" -

(a) means an act which constitutes a corruption offence; and

(b) includes -

- (i) any conduct whereby, in return for a gratification, a person does or neglects from doing an act in contravention of his public duties;*
- (ii) the offer, promise, soliciting or receipt of a gratification as an inducement or reward to a person to do or not to do any act, with a corrupt intention;*
- (iii) the abuse of a public or private office for private gain;*
- (iv) an agreement between 2 or more persons to act or refrain from acting in violation of a person's duties in the private or public sector for profit or gain;*

-
- (v) *any conduct whereby a person accepts or obtains, or agrees to accept or attempts to obtain, from any person, for himself or for any other person, any gratification for inducing a public official, by corrupt or illegal means, or by the exercise of personal influence, to do or abstain from doing an act in the exercise of his duties to show favour or disfavour to any person.*

The sections 4 to 17 of the Prevention of Corruption Act 2002, as amended, deal with the laws penalising corruption offenses. These include bribery by public official, bribery of public official, taking gratification to screen an offender from punishment, public official using his office for gratification, traffic d'influence and conflict of interests, amongst others.

6.0 Responsibilities for implementing the policy

The responsibility to develop and coordinate the implementation of the policy shall rest upon the Board through the Anti-Corruption Committee (ACC) established for the purpose. The ACC shall set priorities, provide advice when ethical issues arise and communicate the policy to all levels of management and staff.

The Anti-Corruption Committee - The committee shall comprise of members from both operational and support departments of the Sugar Insurance Fund Board.

The Internal Auditor shall lead the project and chair all meetings. The ACC shall be responsible for coordinating and implementing the anti-corruption policy. It shall develop a time-bound programme with clear and precise deliverables submit for approval the programme and required associated budgetary provision (if any). The SIFB shall designate an officer to act as Secretary to the committee.

The committee shall meet on a regular basis. The committee shall decide upon the setting up of sub-committees to assist the ACC in the implementation of any initiatives decided by the ACC.

Role of Management - It is the responsibility of the Chief Executive Officer and Heads of Sections to promote the anti-corruption policy within their areas of operation. They are expected to actively deter, prevent and detect corruption by maintaining effective control systems and ensuring that their staff are familiar with the policy.

Role of Employees – Each employee shall read, be familiar with and strictly comply with the policy. The organisation shall ensure that each employee is provided with a copy of this policy or otherwise has on-line access.

Role of Internal Audit– The Internal Audit has the responsibility to ensure the effectiveness and adequacy of the Internal Control System in place. It should ensure that the system is subject to regular audit to provide assurance that they are effective in countering corruption opportunities.

7.0 Risk Assessment

The SIFB is conscious that the risk of corruption may occur in the sphere of its activities and may evolve in the light of changing circumstances and working environment. In its endeavour to proactively address risks of corruption, the SIFB shall ensure that a proper risk management process is in place. Risk assessment should focus on a thorough analysis of the functional activities in close collaboration with officers involved in the process with a view to identifying necessary corruption prevention measures including policies and procedures should be developed to address the risks. The responsibility to plan, coordinate and monitor the risk management process rests with the ACC.

8.0 Handling and reporting corruption

Reporting suspected cases of corruption - Notwithstanding Section 44(1) of the Prevention of Corruption Act 2002 as amended which provides that where an officer of a public body suspects that an act of corruption has been committed within or in relation to that public body, he **shall** forthwith make a written report to the ICAC, the organisation shall put in place measures that shall facilitate the reporting of suspected cases.

Section 45 of the PoCA 2002, as amended, provides that where in the exercise of his functions, the chief executive of a public body is of the opinion that an act of corruption may have occurred, he may refer to the ICAC for investigation.

Confidentiality - Information pertaining to complaints shall not be disclosed to any unauthorised party.

9.0 Protection of whistleblowers

There will be no reprisal by management against “the public official” who in good faith reports an act of corruption or malpractice or suspected illegal and dishonest activity or any activity that he/she has witnessed. However, disciplinary actions may be taken against any person who knowingly makes false allegations.

10.0 Disciplinary measures

The SIFB is committed to ensuring that this policy is duly implemented in the organisation.

Disciplinary measures in accordance with established procedures will be taken against any staff who is found guilty of a breach of the provisions contained in this policy.

11.0 Training and Communications

The Sugar Insurance Fund Board recognises that the success and credibility of this policy depends on effective training, communications and the awareness of employees throughout the organisation. Management should ensure that the anti-corruption policy is clearly disseminated to all staff and that its contents are understood.

12.0 Review of policy

This policy will be reviewed as and when necessary or in the event of any changes in the laws and regulations that are relevant to the SIFB. The Chairperson of the ACC should recommend the review to the Audit and Risk Management Committee and/or the Chief Executive Officer.

Any part of this document which contravenes any appropriate legislation shall to that extent be null and void.

13.0 Approval

The Anti-Corruption Policy was approved by the Board at its meeting of the 26th February 2015.