



MISSION OF HOPE INITIATIVE (MOHI)

Hope Beyond Tomorrow

CODE OF CONDUCT, CONFLICT OF INTEREST AND ANTI-FRAUD POLICY

Policy Version 1.0

Issued upon Board approval in 2026

Policy owner	MOHI Board of Directors
Approving authority	MOHI Board Chairperson, on behalf of the Board
Effective date	Date of actual Board approval
Review cycle	Every three years, or earlier where required by law, donor requirements, or organisational need

This policy applies to Board members, staff, volunteers, interns, consultants, service providers, partners and any person acting for or on behalf of MOHI.

DOCUMENT CONTROL AND APPROVAL

This policy sets the minimum ethical, behavioural and accountability standards for everyone associated with Mission of Hope Initiative (MOHI). It should be read together with MOHI's Safeguarding and Child Protection Policy, Safeguarding PSEA/SEAH Addendum, Whistleblowing, Complaints and Non-Retaliation Policy, Human Resources and Volunteer Management Policy, and Financial Management, Procurement and Internal Controls Manual.

Approval

This policy becomes effective only when approved by the MOHI Board. The approval date must be the actual date on which the authorised Board representative signs this document.

Approved by	MOHI Board of Directors
Authorised signatory	Jjuuko Fred, Board Chairperson
Signature	
Approval date	
Review due	Three years from approval date, or earlier if required

Policy Contacts

Concern category	Reporting route
Ethics, conduct and general complaints	advocacy@missionofhopeinitiative.org +256 770 588 388
Financial irregularities, fraud or procurement concerns	finances@missionofhopeinitiative.org +256 770 588 388
Safeguarding, sexual exploitation, abuse or harassment concerns	Report through the safeguarding channels communicated by MOHI, including the designated safeguarding focal person or alternate focal person.

Conflicts and escalation

A person must not receive, assess, investigate or approve a concern in which they have a personal, financial, family, professional or other conflict of interest. Reports involving a Board member, senior leader, focal person or signatory must be referred to another non-conflicted Board member or, where necessary, to an appropriate external authority or donor channel.

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How to use this policy

The policy states the minimum standards. Where a donor, law or contract requires a stricter standard, the stricter standard applies. Where a safeguarding issue arises, MOHI's safeguarding procedures and referral obligations apply immediately.



1. PURPOSE, SCOPE AND GUIDING PRINCIPLES

1.1 Purpose

MOHI is committed to integrity, accountability, dignity, inclusion and responsible stewardship of resources. This policy establishes clear standards for conduct, identifies conflicts of interest and prohibited practices, and sets expectations for preventing and reporting fraud, corruption, misuse of resources, harassment, exploitation and other misconduct.

1.2 Scope

This policy applies to all Board members, staff, volunteers, interns, consultants, facilitators, contractors, suppliers, implementing partners, visitors and any other person acting for, representing or receiving delegated authority from MOHI. It applies during work activities, travel, events, online engagement, community outreach, meetings and any use of MOHI resources or identity.

1.3 Guiding principles

- Integrity: act honestly, transparently and in the best interests of the communities MOHI serves.
- Respect and dignity: treat every person fairly and without discrimination, humiliation, intimidation or abuse of power.
- Accountability: make decisions that can be explained, documented and reviewed.
- Inclusion: promote meaningful participation of young women, young persons with disabilities and other underserved groups.
- Safeguarding: prevent harm, respond to concerns promptly and prioritise the safety and wellbeing of children, young people and adults at risk.
- Independence and non-partisanship: do not use MOHI resources, platforms or activities to advance a political party, candidate or personal political agenda.
- Value for money: use funds, property and time only for approved organisational purposes, with appropriate evidence and authorisation.

No individual is above this policy

Position, seniority, volunteer status, personal relationships or past service to MOHI do not exempt anyone from these standards.

2. DEFINITIONS

Term	Meaning
Conflict of interest	A situation where a person's personal, family, financial, business, political or other interest could influence, or appear to influence, their impartial organisational judgment.
Related party	A family member, close associate, business, organisation or other entity connected to a Board member, staff member, volunteer, consultant or decision-maker.
Fraud	Intentional deception or dishonest conduct for personal or other improper gain, or to cause loss. It may include false claims, forged documents, theft, diversion of funds or misrepresentation.
Corruption	Offering, giving, requesting, receiving or accepting an improper benefit to influence a decision or obtain an unfair advantage.
Bribery	The giving or receiving of money, gifts, services, favours or anything of value to improperly influence an action or decision.
Safeguarding concern	Any concern, suspicion, disclosure or allegation of harm, abuse, neglect, exploitation, sexual exploitation, abuse or harassment, or unsafe conduct affecting a child, young person or adult at risk.
Retaliation	Any adverse action, threat, intimidation, exclusion, demotion, loss of opportunity or harassment because a person reported a concern or participated in an inquiry in good faith.
Good faith report	A report made honestly on the basis of information or a reasonable concern, even if the concern is later not substantiated.

A person does not need to prove wrongdoing before making a report. They are expected to raise concerns honestly and should not knowingly make malicious or false allegations.

3. EXPECTED STANDARDS OF CONDUCT

3.1 Core conduct requirements

- Act lawfully, honestly, professionally and in a manner that protects the reputation and independence of MOHI.
- Follow approved work plans, budgets, policies, safeguarding procedures, procurement requirements and written delegations of authority.
- Treat participants, community members, colleagues, partners and suppliers with courtesy, dignity and respect.
- Keep accurate records of decisions, transactions, attendance, accountability and project activities as required by role.
- Declare actual, potential or perceived conflicts of interest promptly and withdraw from related decisions.
- Use MOHI property, funds, vehicles, equipment, communications channels and information only for authorised purposes.
- Cooperate with reasonable audits, reviews, safeguarding inquiries and investigations.
- Report suspected misconduct, fraud, corruption, abuse, exploitation, discrimination, retaliation or serious safety risks promptly.

3.2 Prohibited conduct

- Theft, fraud, falsification of records, double claiming, unauthorised borrowing, diversion of funds or misuse of assets.
- Bribery, kickbacks, facilitation payments, collusion, favouritism or seeking personal benefit from MOHI decisions.
- Harassment, bullying, hate speech, intimidation, discrimination, violence, sexual exploitation, abuse or harassment.
- Retaliation against a person who reports concerns or participates in a review in good faith.
- Using MOHI's name, premises, vehicles, equipment, data, accounts or events for private business, personal fundraising or party-political activity without authorised Board approval.
- Sharing confidential participant, staff, donor, financial or safeguarding information without a legitimate work reason or appropriate consent.
- Signing blank forms, blank cheques, incomplete payment vouchers, inaccurate attendance lists or documents a person knows to be misleading.

4. RESPECT, INCLUSION, SAFEGUARDING AND NON-DISCRIMINATION

MOHI seeks to create an environment where people can participate safely and with dignity. All representatives must respect differences of sex, gender, age, disability, language, nationality, religion, social background, health status, sexual orientation, political opinion or any other protected or personal characteristic.

4.1 Inclusion and accessibility

- Plan activities so that young women, young persons with disabilities and other underserved participants can engage meaningfully.
- Use respectful language and avoid stereotyping, degrading labels or assumptions about capacity, identity or experience.
- Provide reasonable accessibility measures where feasible, including accessible venues, clear communication, suitable scheduling and participation support.
- Do not deny participation, information or opportunity because a person has a disability, comes from a marginalised community or holds a different view.

4.2 Safeguarding and professional boundaries

- Comply with MOHI's Safeguarding and Child Protection Policy and PSEA/SEAH Addendum at all times.
- Do not engage in sexual activity with a child, exploit a person's vulnerability, request sexual favours, or use money, goods, services, employment, assistance or influence to obtain sexual access or other improper benefit.
- Do not develop or encourage relationships with children or adults at risk that are exploitative, abusive, coercive or inappropriate.
- Use consent and safe practices when collecting stories, photographs, videos, contact details or digital content from participants.
- Report safeguarding concerns immediately through MOHI's safeguarding reporting route. Do not investigate a safeguarding allegation yourself unless formally authorised and trained to do so.

Urgent danger

Where a person faces immediate risk of harm, seek urgent protection and contact the appropriate emergency, child-protection, health or law-enforcement service in line with safeguarding procedures. MOHI is not a substitute for statutory authorities.

5. CONFLICTS OF INTEREST AND RELATED-PARTY TRANSACTIONS

5.1 Duty to disclose

Every Board member, staff member, volunteer, consultant and person participating in procurement, recruitment, selection, grant management or financial approval must disclose any actual, potential or perceived conflict of interest before taking part in the relevant decision. Disclosure must be made in writing using the declaration form in Appendix B or another documented form accepted by the Board.

5.2 Examples of conflicts

- A Board member participates in selecting a supplier owned by, employing or closely connected to them.
- A staff member approves a payment, advance, allowance, contract or recruitment decision that benefits themselves or a related party.
- A volunteer uses privileged information obtained through MOHI for a private business opportunity.
- A decision-maker receives a gift, favour or promise of benefit from an applicant, supplier, partner or community representative.
- A person uses their role to favour relatives, friends, political associates or personal business interests.

5.3 Management of conflicts

- Disclose the conflict immediately and fully.
- Do not participate in discussion, scoring, evaluation, negotiation, approval, payment, supervision or monitoring related to the conflict unless the non-conflicted Board expressly permits a limited role and records the rationale.
- Leave the meeting or portion of the meeting where the matter is discussed, where appropriate.
- Record the disclosure, decision and mitigation action in the relevant minutes, procurement file or conflict register.
- For a related-party transaction, demonstrate that it is necessary, offers fair value, follows due process and is approved by non-conflicted decision-makers.

Rule for financial approvals

No person may request, verify, approve, sign or receive a payment in which they have a direct or indirect personal interest. Separation of duties must be applied as far as practical, with Board oversight where capacity is limited.

6. GIFTS, HOSPITALITY, BRIBERY AND POLITICAL NEUTRALITY

6.1 Gifts and hospitality

MOHI representatives must not solicit or accept gifts, cash, commissions, discounts, hospitality, travel, services or favours that could influence, or appear to influence, an organisational decision. Modest customary items of low value may be accepted only where refusal would be culturally inappropriate and where the item does not create an obligation or affect impartiality.

- Cash or cash-equivalent gifts must never be accepted.
- Any gift or hospitality that could reasonably be viewed as influencing a decision must be declined or returned.
- Gifts or hospitality above a modest level must be declared promptly and recorded in the Gifts and Hospitality Register.
- The Board must determine the appropriate treatment of any declared item, including return, organisational use, donation or other transparent handling.

6.2 Bribery and facilitation payments

MOHI has zero tolerance for bribery, kickbacks and facilitation payments. No representative may offer, promise, give, request or receive anything of value to improperly influence a decision, secure an advantage, speed up a service, avoid a requirement or obtain favourable treatment.

6.3 Political neutrality

MOHI respects the rights of individuals to hold personal views. However, MOHI resources, programmes, events, communications, funds and organisational identity must not be used to campaign for or against a political party, candidate or leader. MOHI-funded work must remain independent, non-partisan and focused on peaceful, inclusive community participation.

7. ANTI-FRAUD, FINANCIAL INTEGRITY AND PROTECTION OF ASSETS

7.1 Zero tolerance for fraud and misuse

Fraud, theft, corruption and misuse of resources undermine community trust and may expose MOHI, participants and staff to serious harm. MOHI will prevent, detect, report and address suspected financial misconduct through clear internal controls, documentation, review and appropriate action.

7.2 Financial integrity requirements

- Spend funds only for approved, reasonable, allowable and directly related organisational or project purposes.
- Ensure every payment is supported by appropriate documentation, including approved requests, quotations where required, receipts, invoices, delivery evidence, attendance evidence or other relevant records.
- Do not split purchases or use artificial methods to avoid approval, quotation or procurement requirements.
- Deposit funds received for MOHI into authorised accounts and record them promptly and accurately.
- Use project advances only for their approved purpose and account for them within the timeframe set in the Financial Management, Procurement and Internal Controls Manual.
- Protect cash, cheques, bank information, mobile-money access, equipment, stores, passwords and financial records from loss, misuse or unauthorised access.
- Maintain accurate registers for assets, inventory, advances, procurement decisions and payments as applicable.
- Report lost assets, suspected theft, irregular payments, forged documents, duplicate claims or any other unusual transaction immediately.

7.3 Procurement integrity

- Select suppliers fairly, transparently and on value for money, quality, capability and delivery requirements.
- Use documented quotations, evaluations and approvals where required by MOHI policy, donor requirements or the value and risk of the procurement.
- Do not disclose competitors' quotations or confidential bid information to gain an unfair advantage.
- Do not favour a supplier because of personal relationships, pressure, gifts, political links or expectation of a private benefit.

8. CONFIDENTIALITY, DATA, COMMUNICATIONS AND DIGITAL CONDUCT

8.1 Confidentiality and personal data

Information about participants, staff, donors, financial records, safeguarding concerns, health status, disability, personal circumstances, contact details and internal decisions must be handled confidentially. Access should be limited to people who need the information for legitimate organisational duties.

- Collect only the information needed for a legitimate activity or reporting requirement.
- Store files and digital records securely and avoid sharing personal information through unsafe public channels.
- Do not share photographs, video, stories, case details or identifiable information without appropriate informed consent and safeguarding checks.
- Do not disclose confidential allegations or investigation details beyond authorised persons.
- Report accidental loss, unauthorised access or improper disclosure of sensitive information promptly.

8.2 Digital conduct and social media

- Use MOHI social-media pages, WhatsApp groups, email and other communication platforms respectfully, safely and professionally.
- Do not post hate speech, discriminatory content, threats, sexualised content, confidential information, unverified harmful claims or material that puts participants at risk.
- Do not use a personal account to speak on behalf of MOHI unless authorised.
- Use organisational logos, branding, official statements and media materials only with appropriate permission.
- Moderate project digital spaces in a manner that protects dignity, safety and freedom from harassment, while allowing respectful difference of opinion.

9. REPORTING CONCERNS, NON-RETALIATION AND INVESTIGATIONS

9.1 Duty to report

Everyone covered by this policy has a responsibility to report suspected or actual misconduct promptly. This includes fraud, corruption, conflicts of interest, safeguarding concerns, sexual exploitation, abuse or harassment, discrimination, retaliation, serious safety concerns, theft, misuse of resources, falsification of records and material policy breaches.

9.2 Reporting routes

Type of concern	Reporting route
General ethics, conduct, discrimination or complaints	advocacy@missionofhopeinitiative.org or +256 770 588 388
Financial irregularity, fraud, procurement or asset misuse	finances@missionofhopeinitiative.org or +256 770 588 388
Safeguarding or SEAH concern	Use the designated safeguarding reporting route immediately; contact the safeguarding focal person or alternate focal person as communicated by MOHI.
Concern involving the usual recipient, a Board member or senior decision-maker	Report directly to another non-conflicted Board member, or use an appropriate external authority or donor channel where internal reporting is not safe or appropriate.

9.3 Non-retaliation

MOHI prohibits retaliation against anyone who raises a concern, seeks advice, refuses to participate in wrongdoing, provides information in an inquiry or supports a survivor or complainant in good faith. Retaliation is itself a serious breach of this policy and may result in disciplinary or other appropriate action.

9.4 Handling concerns

- A report will be received respectfully, recorded securely and assessed for immediate safety, safeguarding, financial, legal and reputational risks.
- Information will be shared only on a need-to-know basis and in line with confidentiality, safeguarding and legal duties.
- MOHI will appoint non-conflicted persons to manage, review or investigate the concern. External expertise or referral may be used where appropriate.
- A person making a report will be informed of the process and, where possible, receive appropriate updates without compromising confidentiality or legal obligations.
- MOHI will not treat an unsubstantiated concern as misconduct if it was raised honestly and in good faith.

Anonymous reports

Anonymous reports may be considered. They can be harder to assess or follow up, but absence of a name does not automatically prevent MOHI from taking protective or corrective action based on credible information.

10. RESPONSIBILITIES, TRAINING AND COMPLIANCE

Role	Key responsibilities
Board of Directors	Approve this policy; oversee ethical governance; ensure conflicts are managed; receive relevant reports; provide non-conflicted oversight of serious concerns and major corrective actions.
Board Chairperson	Sign approved policies on behalf of the Board; ensure conflicted Board members do not participate in related decisions; support proper escalation where a concern involves senior leadership.
Finance Director	Maintain financial controls; support transparent budgeting, documentation, procurement, reporting and asset protection; escalate suspected financial irregularities.
Executive Secretary	Maintain Board resolutions, policy records, declarations and registers; support communication of approved policies and follow-up on Board decisions.
Safeguarding Focal Person and Alternate	Receive and refer safeguarding concerns in line with MOHI safeguarding procedures; protect confidentiality; support safe reporting and referral.
Managers, coordinators and supervisors	Model ethical conduct; provide induction; ensure activity-level compliance; manage risks; avoid conflicts; report concerns promptly.
All representatives	Read, understand and comply with this policy; declare conflicts; protect people and resources; seek guidance when uncertain; report concerns honestly and promptly.

10.1 Induction and acknowledgment

Board members, staff, volunteers, interns, consultants and relevant partners will be oriented on this policy as appropriate to their role. Each person covered by the policy may be asked to sign the acknowledgement in Appendix A or another documented acknowledgment before undertaking duties involving participants, finances, procurement, safeguarding or representation of MOHI.

10.2 Breaches and corrective action

Breach of this policy may lead to corrective action proportionate to the facts and seriousness of the conduct. Actions may include guidance, training, warning, removal from a decision, recovery of funds or property, suspension of responsibilities, termination of a contract or volunteer role, referral to a donor or statutory authority, or other lawful action. Safeguarding and criminal matters must be handled in line with applicable referral and legal processes.

10.3 Review and amendments

The Board will review this policy at least every three years, or earlier when organisational circumstances, law, donor requirements, safeguarding learning or serious incidents make revision necessary. All amendments require Board approval and must be communicated to affected persons.

APPENDIX A: CODE OF CONDUCT ACKNOWLEDGEMENT

I confirm that I have received, read and understood the MOHI Code of Conduct, Conflict of Interest and Anti-Fraud Policy. I agree to comply with its requirements, declare conflicts of interest promptly, protect participants and organisational resources, and report concerns honestly and without delay.

Full name	
Role / relationship to MOHI	
Organisation / project, if applicable	
Telephone number	
Email address	
Signature	
Date	
Received / witnessed by	

Declaration

I understand that this acknowledgement does not replace my responsibility to comply with other MOHI policies, donor requirements, contracts, safeguarding procedures and applicable law.

APPENDIX B: CONFLICT OF INTEREST DECLARATION

Use this form whenever an actual, potential or perceived conflict of interest arises. Complete it before participating in the related decision, procurement, recruitment, payment, partnership or activity. Where a conflict is identified during a meeting, the disclosure and management decision must also be recorded in the meeting minutes.

Name	
Role / relationship to MOHI	
Date of declaration	
Matter / decision / procurement involved	
Nature of the interest or relationship	
Related party, supplier, applicant or entity involved	
Proposed management action	For example: recusal, non-participation, independent review, alternative signatory, other.
Declaration signature	

Decision by non-conflicted authority

Decision / mitigation agreed	
Name and role of approving non-conflicted authority	
Signature	
Date	

APPENDIX C: GIFTS AND HOSPITALITY REGISTER

Use this register to record any gift, hospitality, invitation, discount, service or other benefit that is offered or received in connection with MOHI work and may reasonably be viewed as more than modest or customary. Cash and cash-equivalent gifts must not be accepted.

Date	Name / role	Offered by	Description / estimated value	Purpose / context	Decision	Authorised by

Decision options

- Declined or returned.
- Accepted as a modest customary item and recorded.
- Accepted on behalf of MOHI and retained for organisational use.
- Donated or otherwise disposed of transparently with Board guidance.

Final reminder

When uncertain, do not accept the benefit and seek advice before acting. Transparency protects both the individual and MOHI.