



ANIS FOUNDATION INCORPORATED

PORT MORESBY

Head Office Location: Section 52, Allotment 18, Varahe Rd, Gordons

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LAE

Regional Office Location: Opposite Boinamo Gravel, Independence Drive, Kamukung, Lae, Morobe Province

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CHILDREN AND BENEFICIARIES PROTECTION POLICY

1.0 POLICY – APPLICATION

This policy ensures that the protection of children and beneficiaries (adults) are effectively executed by implementation of reasonable behavior standards and protocols established within the code of conduct. This shall be carried out by all employees, contractors, consultants and other stakeholders or development partners across organization-wide including project sites, within offices or any other locations impacted by ANIS Foundation activities or its clients.

The application of this policy gives prominence and necessary credence to the rightful protection of child and beneficiary in pursuit of achieving international benchmark on children's rights, protection and human dignity.

2.0 PROCEDURE

2.1 ANIS Foundation's employees or contractors or consultants or other stakeholders must ensure that all behavior standards and protocols pertaining to child and beneficiary protection enshrined in the code of conduct or other relevant laws must be adhered to and effectively executed. In breach of the code of conduct or such other laws shall be subject to serious disciplinary actions including termination of employment or contract or engagement or criminal prosecution for severe breaches such as sexual exploitation or harassment or assault or bodily harm or such other similar occurrences deemed unlawful or criminal in nature.

2.2 In the event of a child or adult being abused or harassed or exploited sexually or physically must be immediately reported to the ANIS Representative on site or Human Resource Manager or Executive Director within 24 hours of the occurrence (refer to whistle blower policy on communicating or reporting such incidences)

2.3 Upon having received report of such severe breach an internal investigation shall proceed to ascertain facts and determine the cause and identify the person (s) involved.

2.4. The alleged person (s) may be suspended from duty without pay for a period of two (2) weeks pending investigation findings and report.

2.5 After the investigation if found to be involved in or in breach they shall be terminated immediately and the two weeks suspension period will not be paid, hence, they shall not be

rehired in the future. In the event of a contractor employee if found to have breached the policy shall be terminated immediately and removed from site or office or if a consultant is in breach their engagement contract shall cease with immediate effect and removed from office or site.



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SEXUAL EXPLOITATION AND ABUSE POLICY

1.0 POLICY – APPLICATION

This policy ensures that sexual exploitation and abuse is intolerable and prohibited. It is the responsibility of the ANIS Foundation as a humanitarian organization to establish mechanisms or measures to handle cases of sexual exploitation and abuse ensuring zero tolerance of such occurrence or incidents. Also execute effective awareness programs on sexual exploitation and abuse throughout the organization and within communities that they interface regularly and do business with ensuring that all employees, contractors, consultants, other stakeholders and communities understand implication of sexual exploitation and abuse which is an indecent behavior, serious breach of code of conduct which may therefore result in instant dismissal and also is unlawful which may result in possible legal prosecution.

The application of this policy provides a distinct direction which as an organization will achieve better outcomes in regards to safe and better work environment in pursuit of zero tolerance to sexual exploitation and abuse that may increase the credibility and profile of the organization.

2.0 PROCEDURE

2.1 ANIS Foundation's employees or contractors or consultants or other stakeholders must ensure that all behavior standards and protocols pertaining to sexual exploitation and abuse stipulated in the code of conduct or other relevant laws must be adhered to and effectively executed. Sexual exploitation and abuse is a serious breach of code of conduct therefore may cause dismissal or termination of employment or may lead into criminal prosecution if severely implicated for exploitation or sexual harassment or assault or bodily harm or such other similar occurrence deemed unlawful or criminal in nature.

2.2 In the event of a child or adult being abused or harassed or exploited sexually or physically must be immediately reported to the ANIS Representative on site or Human Resource Manager or Executive Director within 24 hours of the occurrence (refer to whistle blower policy on communicating or reporting such incidences)

2.3 Upon having received report of such severe breach an internal investigation shall proceed to ascertain facts and determine the cause and identify the person (s) involved.

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2.5 After the investigation if found to be involved in or in breach they shall be terminated immediately and the two weeks suspension period will not be paid, hence, shall not be rehired in the future. In the event of a contractor employee if found to have breached the policy shall be terminated immediately and removed from site or office or if a consultant is in breach their engagement contract shall cease with immediate effect and removed from office or site.



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CATEGORIES OF OFFENCES / BREACHES AND PENALTIES

Item#:	Policy Notation	Offense/Breach Description	Penalties (Counselling Record/1 st Written Warning/Final Written Warning/Dismissal)	General Remarks
01	Child & Beneficiary Protection /Sexual Exploitation and Abuse Policy	i. use of obscene or vulgar or discriminatory or offensive or abusive language against a child or a beneficiary	i. Final Written Warning	This may also lead to dismissal if seen fit by management depends on the severity impact
		ii. violent approach, hit & verbally abuse a child or a beneficiary	ii. Final Warning	This may also lead to dismissal if assessed fit by management depending on severity impact
		iii. without informed consent of a child or parents or guardians reproducing images or photographing or filming a child	iii. Final Written Warning	It may also be dismissal if implications of the byproduct is offensive against the child and or parents or immediate family members
		iv. any form of mistreatment or bias selection or discrimination	iv. Written Warning	It may also lead into a Final Warning or Dismissal depending on the

		based on family background or, colour, or creed, or religion or other physical factors such as disability or facial or physical structure or health condition		severity of the discrimination or stigmatizing effects
		v. Child Labour- involve children in any kind of activity that is physically, mentally or morally more dangerous and more advantageous or beneficial to the adult using the children than the children themselves	v. Written Warning	Child labour activity must be clearly spelt out to the adult employees or consultants or contractors or community they are dealing with and everyone must understand well. This may also lead to Final Warning depending on the impact
		vi. Hitting a child or executing corporal punishment on children based on any kinds of reason (s)	vi. Final Written Warning	May lead to dismissal depending on the severity or impact of the force or punishment executed or used on the child
		vii. Failure to enroll children at a school or taking care of them when sick or take them to nearest clinic for medical attention	vii. Written Warning	Parents or Guardians' responsibility and failure to comply will be summoned strongly issue the warning letter
		viii. Failure to clothe and	viii. Final Written	These are the basic universal rights of

		provide food and shelter for the children		children and humanity, failure to provide, based on the severity of the impact may lead into dismissal.
		vx. Allocating any tasks to children and beneficiaries against their will or consent	vx. Written Warning	Accord the children and beneficiaries with due respect and mutual agreement must be in place before engaging into any activity..
		x. Engage children to purchase illicit drugs or cigarettes or alcohol or allow them to take those non-prescribed drugs or cigarettes or alcohol	x. Instant Dismissal or Termination of Engagement Contract	May also refer for prosecution of those engaging the children to involve in those illegal activities
		xi. Sexual exploitation and Abuse or forced prostitution or sex worker	xi. Instant Dismissal or Termination of Engagement Contract	Xi. May also refer for prosecution



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CODE OF CONDUCT

CHILD and BENEFICIARY PROTECTION / SEXUAL EXPLOITATION and ABUSE

All employees or consultants or contractors or partners of ANIS Foundation shall always adhere to the stipulated code of conduct and practice on regular basis. These code of conduct shall be implemented and in force within the ANIS Foundation premises, offices, project sites or communities Anis Foundation deals with or its partners or clients;

1.0 Sexually exploit and abuse any children and beneficiaries by ANIS employees or any such doing or behavior constitutes an act of gross misconduct, which is a serious breach of code of conduct, therefore grounds for dismissal or termination;

2.0 Involve in sexual activity with children (under age 18) is prohibited whether or not it is being consented by children or parents or guardians locally. Assuming or opinionating or mistaken belief of an age of the victim (child) deemed not a defense.

3.0 Engage in any sexual favours in exchange of money or employment or provision of goods or services or any forms of degrading , humiliating and exploitative behavior or forced prostitution or hiring as sex workers by humanitarian workers is a breach of trust and code of conduct;

4.0 Use of any abusive or vulgar or obscene words against children and beneficiaries.

5.0 Sexually harass, or fondle or lustful kiss, or hug, or touch children or beneficiaries in a way or manner deemed inappropriate or culturally insensitive way.

6.0 Make any remarks or comments that is humiliating, or degrading, or sarcastically worded to cause any upset or hiccups or dissatisfaction against the children and beneficiaries;

7.0 Deal with children or beneficiaries individually behind closed doors to avoid any possible false accusations that has the potential to only demoralize or deface the children's and beneficiaries' good behavior or deemed character assassination or disrepute Anis Foundation's good deed or profile or reputation

8.0 Engage or hire children in any form of activities that are more beneficial to the adults than the children deemed mentally or physically or socially or morally dangerous and harmful to children or that impede or interfere with their development or education.

9.0 Engage or encourage children into participating, promoting, supporting or indulging in the illegal activities that are unsafe, unhealthy or abusive such as harmful traditional practices, spiritual or ritual activities including sorcery, witchcraft, cult practices, early marriage, drug and alcohol abuse, teenage initiation of genital foreplay or forced sexual or nostril or anal penetration or pierce nose, ear or genitals and others deemed dangerous or unethical and unlawful.

10.0 Shall not engage children in any activities or programs that are exhaustive, stressful, beyond capability or mind boggling, or de-energizing, such as, carrying unreasonable load distance afar, forcefully engaging them against their capability and consent, continuous physical activities that are stressful and exhaustive or such other activities deemed not fulfilling any requirements for child's development, health and progress.

11.0 Exposing children and beneficiaries to pornographic materials including colorful photos, or pictures, movies, or sexist cartoons or statues, or live sexual intercourse and such other materials or activities or behaviors considered offensive or sexist and illegal is strictly prohibited ,therefore, subject to summary dismissal and refer for criminal prosecution.

12.0 Any sexual relationship between humanitarian worker (ANIS employees, consultants, contractors or partners) and a person (children and beneficiaries) benefitting from such assistance and protection by using rank or position is intolerable and prohibited. These sort of relationships undermine the credibility and integrity of ANIS Foundation as a humanitarian aid work organization.

13.0 In the event of an employee or consultant or contractor or partner of ANIS Foundation develops some opinions or concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established ANIS Foundation internal reporting process or mechanism.

14.0 ANIS Foundation workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels must lead by example and are responsible for supporting and enhancing systems which create and maintain such conducive environment.



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PROTECTION AGAINST FRAUD, BRIBERY, CORRUPTION AND OTHER UNETHICAL BEHAVIOURS OR PRACTICES (ANTI-CORRUPTION, BRIBERY AND FRAUD) POLICY

POLICY – APPLICATION

To ensure that all behavior standards, business activities, practices, procedures processes, and approval of all documentation pertaining to monetary benefits or any other benefits are in line with best practice and within established procedures which are free of Fraud, Bribery, Corruption and Unethical Behaviors. It is the responsibility of all ANIS employees, consultants, contractors, partners or clients to raise alarm or report any fraudulent or bribery or corruptible practices or such other practices or activities or behaviors deemed unethical to a relevant ANIS Senior Manager or Human Resource Manager or Executive Director directly.

PROCEDURE

- 1.0** Employee or consultant or contractor of ANIS Foundation must report any activities deemed fraudulent, corruption or bribery or such other unethical behaviors or practices to a relevant senior manager or human resource manager or to the Executive Director.
- 2.0** Any suspicion of an unethical behavior that is detected at the workplace, it must be immediately reported to the Human Resource Manager or a Senior Manager or the Executive Director. Those who report such activities or incidences shall be protected by the Whistleblower Policy.
- 3.0** Upon receiving such information or complaint, the senior management of the organization shall immediately issue suspension notice (2 weeks without pay) to the alleged offenders and institute an internal investigation to ascertain facts about the fraudulent or corruptible activity
- 4.0** The investigation team shall comprise of an Internal Auditor or Finance Manager (if the allegation is of a monetary nature), Security & Systems Manager, Procurement Manager or HR Manager or a Senior Manager. In the event of a large sums of money involved an external investigating team shall be engaged or register with National Fraud Squad and they shall conduct investigation. The National Fraud Squad shall arrest the alleged offenders and deny their bail application until ordered or allowed by Competent Jurisdiction or Courts.

5.0 Whilst the investigation is proceeding the alleged offender (s) shall be barred accessing the organization's premises or work sites or vehicles or any other property of ANIS Foundation or its subsidiaries or partners or clients.

6.0 Once the internal investigation report is provided for the value of money less as determined by the Executive Director and if they are found responsible for the fraudulent activity they shall be dismissed from employment and all entitlements be withheld and forfeited to the organization.

7.0 After the external investigation conducted by Anti-corruption Fraud Squad is compiled and presented to the National Courts and the Courts find that they are guilty and convicted of the criminal offence, they shall be dismissed from office or employment and all entitlements be withheld and forfeited to the company if ordered by courts as restitution. However if proven innocent and the courts ordered for reinstatement then they shall be reinstated to their respective substantive positions with full entitlements as directed by the courts.

8.0 Using bribery as a means of accessing information or processing payments or inducing approval in a more expeditious way beside adherence to normal process is prohibited and shall be reported immediately to the senior management. Bribery in a way of handing out cash, or obtaining commission, or an inducement gift or colluding and corroborative actions or such other action deemed inducement to change normal process or cause of action is a serious offence therefore if adequate evidence provided they shall be instantly dismissed from office or employment

9.0 The names of the Fraudsters be publicized in the media and advise the public that they are no longer employees of the ANIS Foundation or its subsidiaries and enlist them in the Ban for Life list not to be rehired. These people shall not be issued with any references or certificate of service or such other documents having organization's logo or name on them.



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WHISTLEBLOWER POLICY

POLICY – APPLICATION

To ensure that all employees of the organization who provide information or report of any unethical behaviors or fraudulent or corruptible or bribery activities or such other activities deemed illegal to the senior management are highly protected. It is the responsibility of the organization to protect the whistleblowers from any possible retaliation or such other unreasonable actions by the offenders.

PROCEDURE

1.0 All information provided by the whistleblowers pertaining to the illegal activities or serious breaches must be kept highly confidential by the senior management or people who were entrusted and provided the information with.

2.0 This information must then be registered and relevant actions must be undertaken immediately. The first person who was reported the matter must immediately report to a more senior relevant manager. As much as possible the particulars of the whistleblower must be withheld.

3.0 A whistleblower must always write a statement as an evidence and sign off and this must be confidentially kept in the investigating file and later submit to HR Manager to be filed away in their file.

4.0 Anyone found disseminating information or particulars of the whistleblower will be dealt with severely under the disciplinary procedures including termination of employment.

5.0 In the event of a whistleblower's information being heard by the public, the organization must provide high security and protection to the employee and establish other possible way to handle the situation if possible to the extent of discussing with the employee (whistleblower) and come up with a possible solution including making them redundant by paying them out a redundancy package and advising them that they will be rehired in the future if all situations become normal and an agreement shall be signed between the organization and the whistleblower for future engagement.

6.0 Incentive-based structure shall be made available to credible reports by whistleblowers regarding high profile cases such as fraudulent, bribery and corruptible practices. Upon producing such credible reports or information, then after completion of all eventualities including investigation pertaining to the illegal activity, the whistleblower shall be awarded a gift as determined fit by the Executive Director
