



**The Kenyatta International
Convention Centre**

Africa's Premier Meeting Venue

ANTI-CORRUPTION POLICY

**Prepared by
The Corruption Prevention Committee
The Kenyatta International Convention Centre
P.O. Box 30746-00100
Nairobi**

2020

1. FORWARD

“Corruption is authority plus monopoly minus transparency.” As a State Corporation, the Kenyatta International Convention Centre has been established to implement clearly stated mandate. The mandate clearly gives the corporation its legal authority. We acknowledge that the authority is exercised by the Corporation through its Board, management and staff. We therefore recognize that while exercising the authority bestowed upon the Corporation, we are faced by the risk of corruption and indeed corruption can occur.

One of the key pillars enshrined in our Strategic Plan is the commitment to the ideals of governance, transparency and accountability. Other core values include: customer centric, diversity, environmental sustainability, team work and integrity. From the foregoing, it is evident that good corporate governance coupled with integrity is part and parcel of the KICC Organizational culture.

Georges Bernanos, a French Novelist and Political Writer (1888-1948) famously quoted that **“The first sign of CORRUPTION in a society that is still alive is that the end justifies the means.”** As an institution, we are focused on putting in place systems to guide in our operations. Indeed, our systems have been ISO 9001:2015 certified. Since the environment in which we operate in is dynamic, we shall continuously improve our systems to address the ever-evolving challenges.

It is becoming increasingly difficult to stay honest and open, especially in light of the dynamic environment around us. Your only obligation in life is to be true to yourself and your commitments. In the long run you will achieve more in life than those who sold out their principles for the short-term gain.

This policy is a testament to commitment of the KICC management and staff to uphold integrity by putting in place structures that will continually assess areas susceptible to corruption and putting in place strategies that will decisively deal with corruption.

To the management and staff, I say thus “We expect people to trust us, and therefore it is up to us to give them the reasons to trust us. Our reputation of today will be based on our actions of the past. Our actions today are the building blocks of our future reputation”.

"Ultimately, the struggle against corruption depends upon our sense of morality which tells us that our own egoistic interests do not come before those of public interest. We can take all kinds of preventative measures, and they can be broken down and subverted. But if the moral fibre of our public servants in the delivery of public services is high, then no amount of corruption can subvert our preventative measures" - Dr Dullar Omar (Fighting Corruption: Strategies for Prevention)

POLICY STATEMENT

As management, we commit to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and will implement and enforce effective systems to counter all forms of corruption.

2. LEGISLATIVE AND ADMINISTRATIVE REQUIREMENTS

Management will abide by the following legislative and administrative requirements

- 2.1 Anti-Corruption and Economic Crimes Act, No. 3 of 2003.
- 2.2 Public Officer Ethics Act, No. 4 of 2003.
- 2.3 Ethics and Anti-Corruption Commission Act, No. 22 of 2011.
- 2.4 Leadership and Integrity Act, No. 19 of 2012.
- 2.5 Bribery Act, No. 47 of 2016.
- 2.6 Public Procurement and Disposal Act No. 33 of 2015.

3. SCOPE /APPLICABILITY

This policy applies to the following persons or entities:

- All Management and staff of the Corporation.
- Clients, tenants, consultants, suppliers, contractors and other providers of goods or services to the Corporation.

It is the responsibility of all persons mentioned above to report all incidents of corruption, fraud, theft and maladministration in the manner prescribed elsewhere in this document. All managers are responsible for the detection, prevention and investigation of all corruption, fraud, theft and maladministration in their functional areas.

4. DEFINITION OF CORRUPTION

Actions constituting corruption, fraud, theft and maladministration collectively refer to, but are not limited to:

- Embezzlement of public funds – utilizing funds for other purposes other than those promoting the Corporation's mandate
- Receiving a bribe -A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organization to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage
- Secret inducement for advice – During the tendering process, one of the bidder's requests for guidance in filling the tender document. In return, you are promised some form of benefit.
- Conflict of interest – Doing business with the Corporation

- Bid rigging – unfairly disqualifying some bidders with a view to favour one of the bidders
- Abuse of office – Using your position to gain undue advantage with a view to engage in unethical activities e.g. interfering with recruitment, procurement and other activities.
- Fraudulent acquisition of public property, public service or benefit

5. BREAKDOWN OF CORRUPTION RISK AREAS AND CORRUPT PRACTICES IN CORPORATION

All the functional areas in the Corporation are potential risk areas. They include:-

- The Office of the Chief Executive Officer
- Marketing
- Sales
- Finance and Accounting
- Human Resources
- Information, Communications and Technology systems (ICT)
- Technical Services
- Project Management
- Food and Beverage
- Housekeeping
- Security and Safety
- Supply Chain
- Internal Audit
- Legal and Regulatory Affairs
- Digital department
- Corporate Planning

6. STRUCTURES TO FIGHT CORRUPTION

The Corporation has established interrelated policies and procedures that provide a framework to counter corrupt activities. These include:

- The Code of Conduct
- Corruption Prevention Committee (CPC)
- Employee Handbook
- Integrity Assurance Officers
- Channels for reporting Corruption e.g. Anti-Corruption Box
- Service Charter
- Quality Policy
- Procedure Manuals
- Various Board and Management Committees

7. COMPOSITION OF THE CORRUPTION PREVENTION COMMITTEE/INTEGRITY COMMITTEE

- The Chief Executive Officer (Chairman)
- All heads of department
- Principal Compliance Officer(Secretary)

* Any member who has been trained as an Integrity Assurance Officer may be appointed to serve as the Secretary.

8. MANDATE AND OPERATIONS OF THE CORRUPTION PREVENTION COMMITTEE

The Corruption prevention committee responsibility will be to keep a constant check on organizational operations and procedures and ensure that there are no opportunities for corruption within the organisation. The specific duties will include

- Prioritize activities in the implementation of the corruption prevention programmes;
- Ensure that all corruption prevention initiatives are integrated in all respective functional areas of the organisation;
- Receive and review reports on corruption prevention initiatives and/or recommend appropriate actions;
- Co-ordinate corruption prevention strategies in the Corporation;
- Consider and approve for training on the Public Service Integrity Programme (PSIP) for Corporation's staff;
- Ensure that all decisions and guidelines on corruption prevention are communicated effectively to staff and interested parties;
- Prepare and submit to PSIS secretariat regular reports on the implementation of the programme;
- Receive complaints and information on alleged corrupt activities within their areas of jurisdiction and thereafter evaluate, analyze and recommend appropriate action; and
- Monitor the impact of corruption prevention initiatives and other recommended actions.

Corruption prevention Committee meetings shall be held regularly but at least once in every quarter. Scheduled meetings shall not be cancelled or postponed due to the absence of a member.

The CPC may hold extra ordinary or special meetings as need arise.

All deliberations shall be recorded and minutes circulated to Committee members. A copy of the minutes shall be sent to the PSIP Secretariat.

9. INTERNAL AUDIT REVIEWS

The Internal Audit function within the Corporation plays a crucial role in the prevention and detection of corruption. It provides an institutionalized mechanism for

supervision, control and review of operational system within the corporation as well as play an important role in assessing the nature and extent of nay fraud and corruption risk.

10. HOW TO REPORT CORRUPTION INTERNALLY AND EXTERNALLY

Staff and members of the public are encouraged to report all cases of corruption including undisclosed payments to employees, unethical conduct by KICC Management and staff. This information will help us uncover and effectively address cases of corruption and other drawbacks.

The KICC Corruption Prevention Committee can be reached through the following channels :

1. In person :	Drop report at the anti-corruption box addressed to the Secretary, Corruption Prevention Committee KICC Ground Floors
2. Mail :	P.O. Box 30746 - 00100 Nairobi
3. Phone :	+ 254 (0)3261152

Alternatively, one may report to the Kenya Anti-Corruption Commission using the following contacts:

1. Physical address :	Integrity Centre Milimani/Valley Road Junction
2. Mail :	P.O. Box 61130-00200 Nairobi , Kenya
3. Phone :	General Lines: 020-2717318, 020-310722
4. Fax :	2719757
5. E-Mail	kacc@integrity.go.ke
Report Centre's contacts are:	
Hot Line:	2717468 / 0727-285663 / 0733-520641
Hot Fax: 020-2717473	Email: report@integrity.go.ke

11. HANDLING OF CORRUPTION CASES

All corrupt cases will be dealt with fairly, promptly, expeditiously and within law.

Corruption cases deliberated upon and supported by cogent evidence or reasonable suspicion that a corruption offense has occurred or about to occur should be reported to the Ethics and Anti-Corruption Commission and other law enforcement agencies for further action.

12. PROTECTION OF WHISTLE BLOWERS

An employee/official, who suspects or reports suspected dishonest activity or any such activity that he/she has witnessed, may remain anonymous should he/she so require. Allegations made by employees/officials which are false and made with malicious intent, should be discouraged by Management. The major purpose of any whistle-blower guidelines is to deter punitive actions from being taken (by superiors) against those who disclose corruption, illegality and misconduct. Thus, KICC will ensure existence of good organizational practices that ensures nobody will be demoted, suspended or fired for telling the truth. We believe this should motivate more people to speak out in the public interest (by removing the threat of retribution).

13. DISCIPLINARY MEASURES

Where such malicious or false allegations are discovered, the person who made the allegations must be subjected to firm disciplinary action. There will be no reprisal by management against an employee/official who in good faith reported a violation or suspected violation.

14. TRAINING

The management shall carry out sensitization and training programs for staff on matters of ethics and integrity.

15. MANAGEMENT/IMPLEMENTATION AUTHORITY

The responsibility of the implementation of this policy will rest on the Chief Executive of the Corporation assisted by the Integrity Assurance Officers and the Corruption Prevention Committee.

16. REVIEW

This policy document shall be reviewed at such intervals as management may determine.

17. EFFECTIVE DATE

This policy comes into effect on this _____ day of 2020

CEO _____