

FRAUD, BRIBERY AND ANTI-MONEY LAUNDERING POLICY (AMLPL)



UGANDA COMMUNITY BASED ASSOCIATION FOR WOMEN
AND CHILDREN WELFARE (UCOBAC)

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OF

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TABLE OF CONTENTS

Key Definitions	5
1. Introduction.....	6
2. Policy Statement	6
3. Purpose and Objectives	6
4. Scope and Applicability	7
5. Governance and Oversight	7
5.1 Board of Directors.....	7
5.2 Executive Director	8
5.3 Finance and Administration Department	8
5.4 Program Managers and Officers	8
5.5 Staff, Volunteers and Partners.....	8
6. Risk Management	9
7. Preventive Measures.....	9
7.1 Internal Controls	9
7.2 Due Diligence	11
7.3 Conflict of Interest Management.....	11
7.4 Capacity Building.....	11
8. Whistleblowing and Reporting Mechanisms.....	11
8.1 Right and Duty to Report.....	11
8.2 Reporting Channels.....	12
8.3 Information to be Included in a Report	14
8.4 Good Faith Reporting	14
8.5 Protection of Whistleblowers	14
8.6 False or Malicious Reports.....	14
8.7 Confidentiality	15

9. Investigation Procedures..... 15

10. Response and Disciplinary Measures 15

 10.1 Factors Considered in Determining Sanctions 15

 10.2 Administrative and Employment Sanctions 16

 10.3 Recovery and Restitution of Losses 16

 10.4 Contractual Remedies 17

 10.5 Supplier and Partner Blacklisting..... 17

 10.6 Donor Notification and Reporting 18

 10.7 Referral to Regulatory and Law Enforcement Authorities..... 18

 10.8 Civil Recovery Proceedings..... 18

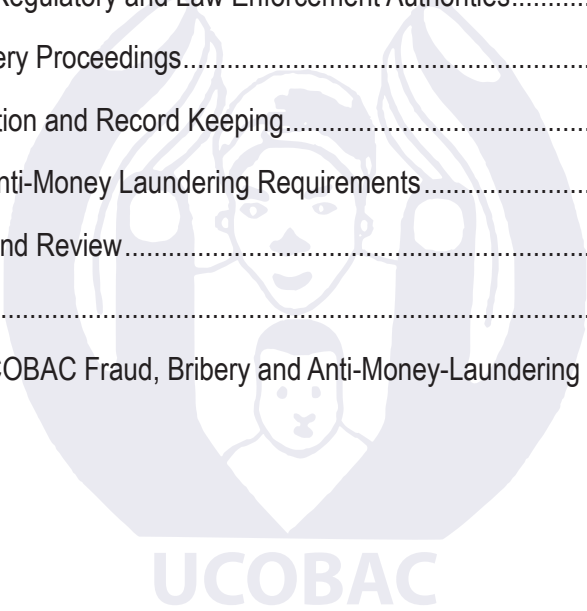
 10.9 Documentation and Record Keeping..... 19

11. Compliance with Anti-Money Laundering Requirements..... 19

12. Monitoring, Audit and Review 19

13. Enforcement 20

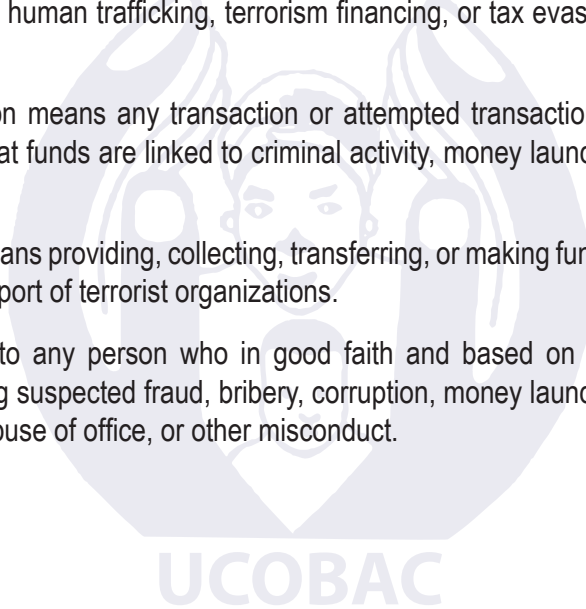
14. Approval of the UCOBAC Fraud, Bribery and Anti-Money-Laundering Policy (AMLP) 20



KEY DEFINITIONS

For purposes of this Policy:

- a) Anti-Money Laundering (AML) refers to the laws, regulations, policies, and procedures designed to prevent criminals from disguising illegally obtained money as legitimate income.
- b) Bribery means offering, promising, giving, soliciting, receiving, or accepting any financial or other advantage to improperly influence a decision, action, or omission.
- c) Fraud means any intentional act, omission, misrepresentation, deception, forgery, concealment, or abuse of position designed to obtain unlawful financial or personal benefit.
- d) Money Laundering means is the process of making money gained from illegal activities such as corruption, fraud, drug trafficking, human trafficking, terrorism financing, or tax evasion appear to come from lawful sources.
- e) Suspicious Transaction means any transaction or attempted transaction that gives rise to reasonable grounds to suspect that funds are linked to criminal activity, money laundering, terrorist financing, fraud, or corruption.
- f) Terrorist Financing means providing, collecting, transferring, or making funds available for the commission of terrorist acts or support of terrorist organizations.
- g) Whistleblower refers to any person who in good faith and based on reasonable grounds, discloses information concerning suspected fraud, bribery, corruption, money laundering, criminal conduct, breach of legal obligations, abuse of office, or other misconduct.



1. INTRODUCTION

The Uganda Community Based Association for Women and Children Welfare (UCOBAC) is committed to conducting its operations with the highest standards of integrity, accountability and transparency. UCOBAC recognizes that fraud, bribery, corruption, money laundering, terrorist financing, and other forms of financial misconduct undermine good governance, divert resources from intended beneficiaries, expose the organization to legal and reputational risks, and threaten the achievement of its mission.

This Policy establishes a comprehensive framework for preventing, detecting, reporting, investigating, and responding to fraud, bribery, money laundering, and related misconduct. It further provides mechanisms for the protection of whistleblowers who disclose information concerning suspected wrongdoing in good faith.

2. POLICY STATEMENT

UCOBAC follows a strict zero-tolerance policy towards fraud, bribery, corruption, money laundering, terrorist financing, and any other unlawful or unethical conduct.

3. PURPOSE AND OBJECTIVES

The objectives of this Policy are to:

- a) Protect the organisation's assets, resources, reputation, beneficiaries, employees, partners, and other stakeholders from fraud, bribery, corruption, money laundering, terrorism financing, and other forms of financial crime.
- b) Promote a culture of integrity, accountability, transparency, ethical conduct, and responsible stewardship of organisational resources.
- c) Ensure compliance with the Anti-Money Laundering Act, Cap. 118, the Anti-Corruption Act, Cap. 116, the Whistleblowers Protection Act, Cap. 34, the Penal Code Act, Cap. 128, donor requirements, and all other applicable laws, regulations, and standards.
- d) Establish clear procedures and responsibilities for the prevention, identification, reporting, investigation, and management of suspected misconduct, financial crime, and regulatory breaches.
- e) Provide secure, accessible, and confidential reporting mechanisms while safeguarding whistleblowers and other persons who report concerns in good faith from retaliation.
- f) Strengthen internal controls, due diligence processes, and risk management systems to prevent the misuse of organisational resources and financial systems for unlawful activities.
- g) Facilitate the timely detection, monitoring, and reporting of suspicious transactions and activities to the appropriate authorities in accordance with legal and regulatory requirements.
- h) Prevent the organisation, its operations, resources, or partnerships from being used to facilitate money laundering, terrorism financing, or any other criminal activity.
- i) Enhance transparency, accountability, and traceability in financial transactions and decision-making processes across all organisational operations.

4. SCOPE AND APPLICABILITY

Compliance with this Policy shall be a mandatory condition of employment, engagement, partnership, consultancy, and provision service(s).

This Policy shall apply to:

- a) All UCOBAC employees, Board members, interns, volunteers, and support staff.
- b) Consultants, contractors, suppliers, service providers, and implementing partners.
- c) Beneficiaries, in instances where the organizational engagements are relevant to them.
- d) All financial, procurement, operational, administrative, governance, and programmatic activities undertaken by or on behalf of UCOBAC.

All Board members, employees, interns, volunteers, consultants, contractors, suppliers, implementing partners, and any other persons acting on behalf of UCOBAC shall conduct themselves honestly, transparently in compliance with the relevant laws in Uganda, donor requirements and organizational policies.

Any person found to have engaged in any prohibited conduct shall be subjected to disciplinary, contractual, civil, and/or criminal sanctions as appropriate.

5. GOVERNANCE AND OVERSIGHT

UCOBAC shall maintain effective governance structures and oversight mechanisms to ensure compliance with this Policy.

5.1 Board of Directors

The Board shall;

- a) Periodically review and Approve changes made in this Policy.
- b) Monitor organizational compliance.
- c) Provide strategic oversight of fraud and AML risks.
- d) Receive reports on significant incidents and investigations.
- e) Ensure corrective measures are implemented.

5.2 Executive Director

The Executive Director shall:

- a) Ensure implementation of this Manual.
- b) Promote a culture of ethical conduct.
- c) Ensure adequate internal controls are maintained.
- d) Authorize investigations where necessary.
- e) Report material cases to the Board.

5.3 Finance and Administration Department

The Finance and Administration Department shall:

- a) Monitor financial transactions.
- b) Maintain accurate financial records.
- c) Conduct transaction reviews and reconciliations.
- d) Identify and escalate suspicious activities.
- e) Support AML compliance and reporting obligations.

5.4 Program Managers and MEAL Officers

Program personnel shall:

- a) Implement risk mitigation measures.
- b) Monitor program activities for irregularities.
- c) Ensure compliance with donor and organizational requirements.
- d) Report suspected misconduct promptly.

5.5 Staff, Volunteers and Partners

All persons subject to this Policy shall;

- a) Comply with organizational controls and procedures.
- b) Declare conflicts of interest.
- c) Report suspected misconduct.
- d) Cooperate with investigations.

6. RISK MANAGEMENT

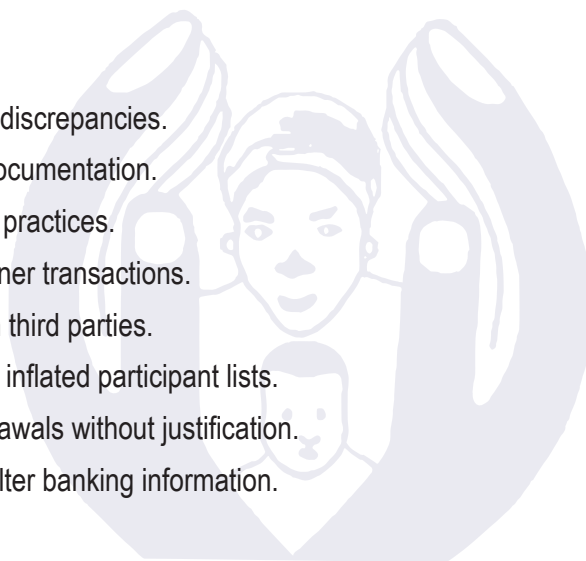
UCOBAC shall implement a risk-based approach to prevent and mitigate fraud, bribery, corruption, and money laundering.

The organization shall:

- a) Conduct annual Fraud and AML Risk Assessments.
- b) Maintain and regularly update a Fraud and AML Risk Register.
- c) Identify, assess, monitor, and mitigate emerging risks.
- d) Strengthen internal controls in high-risk areas.

Key red flags include:

- a) Unexplained financial discrepancies.
- b) Falsified supporting documentation.
- c) Irregular procurement practices.
- d) Unusual donor or partner transactions.
- e) Payments to unknown third parties.
- f) Ghost beneficiaries or inflated participant lists.
- g) Repeated cash withdrawals without justification.
- h) Unusual requests to alter banking information.



7. PREVENTIVE MEASURES

The organisation shall establish and maintain robust internal control systems to minimize the risk of fraud, corruption, money laundering, financial mismanagement, and other forms of misconduct. These controls shall include, but not be limited to the following;

7.1 Internal Controls

a) Segregation of Duties

Key financial, administrative, and operational responsibilities shall be divided among different individuals to ensure that no single person has complete control over a transaction from initiation to completion. Duties relating to authorization, custody of assets, record keeping, verification, and reconciliation shall be assigned to separate personnel to reduce the risk of error, fraud, or abuse.

b) Dual Authorization for Payments

All payments, transfers, and other financial disbursements shall be subject to a minimum of three authorized approvals in accordance with the organisation's financial policies and delegated authority framework. Signatories and approvers shall independently verify the legitimacy, accuracy, and supporting documentation of transactions before approval is granted.

c) Budgetary Controls

All organizational expenditures shall be planned, approved, and monitored against approved budgets. Spending shall only be incurred for authorized activities and within approved budget limits. Budget variance reviews shall be conducted periodically to identify unusual expenditures, unauthorized commitments, or potential financial irregularities requiring corrective action.

d) Procurement Oversight

Procurement processes shall be conducted in a transparent, competitive, and accountable manner in accordance with the organisation's procurement policies and procedures. Adequate oversight shall be exercised throughout the procurement cycle, including a needs assessment, supplier selection, contract award, receipt of goods and services, and payment processing. Measures shall be taken to prevent conflicts of interest, favoritism, bribery, collusion, and procurement fraud.

e) Periodic Reconciliations

Regular reconciliations shall be conducted for bank accounts, cash balances, payroll records, advances, inventories, and any other financial records to verify their accuracy and completeness. Any discrepancies, unexplained variances, or irregular transactions identified during reconciliation processes shall be promptly investigated and resolved.

f) Authorization and Approval Controls

All financial and operational transactions shall be supported by appropriate documentation and approved by authorized personnel before execution. Approval limits shall be clearly defined and communicated to ensure accountability and compliance with organizational policies.

g) Asset Management Controls

The organisation shall maintain accurate records of all organizational assets and conduct periodic physical verification exercises. Appropriate safeguards shall be implemented to protect assets from loss, theft, misuse, or unauthorized disposal.

h) Financial Monitoring and Review

Management shall regularly review financial reports, expenditure trends, project expenditures, and other relevant records to identify unusual patterns, potential risks, or indicators of fraud, corruption, money laundering, or other financial crimes.

i) Record Keeping and Documentation

Complete, accurate, and up-to-date records shall be maintained for all financial and operational transactions. Records shall be retained in accordance with legal, regulatory, donor, and organizational requirements to facilitate transparency, accountability, audits and investigations.

j) Independent Audits and Compliance Reviews

UCOBAC shall conduct periodic internal audits, compliance reviews, and external audits to assess the effectiveness of internal controls, identify weaknesses, and recommend corrective measures to strengthen organizational governance and accountability.

7.2 Due Diligence

Background checks shall be conducted on:

- Staff
- Board of Directors
- Suppliers.
- Consultants.
- Contractors.
- Implementing partners.
- Prospective donors where necessary.

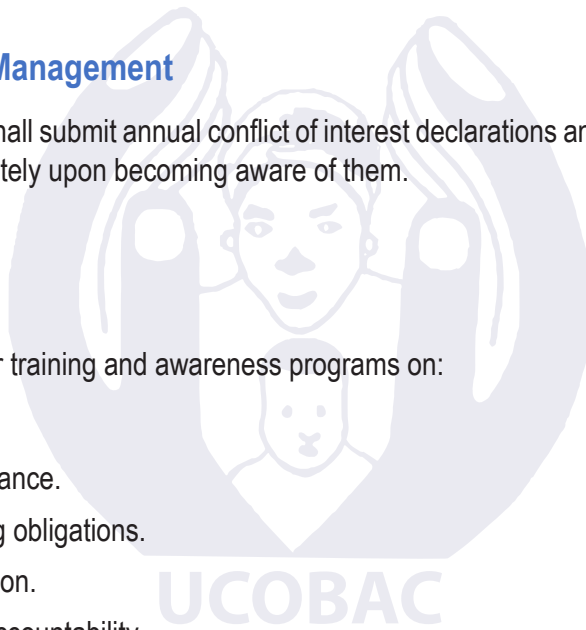
7.3 Conflict of Interest Management

All Board members and staff shall submit annual conflict of interest declarations and disclose any actual, potential, or perceived conflicts immediately upon becoming aware of them.

7.4 Capacity Building

UCOBAC shall provide regular training and awareness programs on:

- Fraud prevention.
- Anti-corruption compliance.
- Anti-money laundering obligations.
- Whistleblower protection.
- Ethical conduct and accountability.



8. WHISTLEBLOWING AND REPORTING MECHANISMS

8.1 Right and Duty to Report

Every employee, Board member, volunteer, consultant, supplier, partner, beneficiary, and stakeholder has both the right and responsibility to report suspected misconduct.

Reports may relate to:

- Fraud.
- Bribery and corruption.
- Money laundering.
- Theft and embezzlement.

- Misuse of donor funds.
- Conflict of interest.
- Abuse of authority.
- Breach of laws, policies, or donor requirements.

8.2 Reporting Channels

A person making a report may use any of the following reporting channels depending on the nature and sensitivity of the concern:

a) Immediate Supervisor

Where appropriate, concerns may be reported directly to the employee's immediate supervisor or line manager. Supervisors receiving such reports shall document the complaint, maintain confidentiality, and promptly escalate the matter to the Executive Director or designated officer for further action.

However, where the allegation involves the supervisor or there is a reasonable belief that reporting to the supervisor may compromise the investigation, the reporter should use an alternative reporting channel.

b) Executive Director

Reports may be submitted directly to the Executive Director where:

- The matter involves significant financial, operational, or reputational risk to UCOBAC;
- The person reporting is uncomfortable reporting through normal supervisory channels;
- The allegation concerns misconduct by a supervisor or manager; or
- The matter requires immediate management intervention.

The Executive Director shall ensure that all reports are recorded, assessed, and acted upon in accordance with this Manual.

c) Chairperson of the Board

Reports may be submitted directly to the Chairperson of the Board where:

- The allegation concerns the Executive Director;
- The reporter believes senior management may be implicated;
- There is concern that management may not handle the matter impartially; or
- The matter presents significant governance or organizational risk.

The Chairperson shall ensure that an independent review or investigation is initiated where necessary.

d) Board Audit and Risk Committee

The Board Audit and Risk Committee shall serve as an independent oversight body for serious allegations involving fraud, bribery, corruption, money laundering, misuse of donor funds, conflicts of interest, or weaknesses in internal controls.

Reports submitted to the Committee shall be reviewed confidentially and may result in the commissioning of an independent investigation, audit, or forensic review.

e) Dedicated Whistleblowing Email

The organisation shall establish and maintain a dedicated whistleblowing email address for receiving reports of suspected misconduct.

The whistleblowing email shall:

- Be accessible to all stakeholders;
- Allow submission of reports at any time;
- Be monitored only by authorized personnel;
- Maintain confidentiality of information received; and
- Be protected against unauthorized access.

Reports submitted through this channel should include, where possible, details of the alleged misconduct, persons involved, dates, locations, and any supporting evidence.

f) Anonymous Reporting Mechanisms

The organisation recognizes that some individuals may fear retaliation or victimization and therefore allows anonymous reporting. Anonymous reports may be submitted through designated channels without revealing the identity of the reporter. While anonymous reports may limit the organization's ability to seek clarification or provide feedback, they shall be assessed and investigated to the extent possible based on the information provided.

No report shall be disregarded solely because it was submitted anonymously.

g) Suggestion Boxes and other Designated Reporting Platforms

UCOBAC shall establish secure suggestion boxes, online reporting portals, telephone hotlines, or other reporting platforms to facilitate disclosure of concerns. These mechanisms shall:

- Be accessible to staff, partners, beneficiaries, and stakeholders;
- Provide a secure means of submitting information;
- Ensure confidentiality of reports;
- Be monitored regularly by authorized personnel; and
- Support timely review and response to reported concerns.

8.3 Information to be Included in a Report

Where possible, a report should contain the following information:

- Description of the suspected misconduct;
- Date, time, and location where the incident took place;
- Names of persons involved;
- Details of witnesses, if any;
- Estimated value of any loss or benefit obtained;
- Supporting documentation or evidence available; and
- Any other information that may assist in the investigation.

A report shall not be rejected merely because some of the above information is unavailable.

8.4 Good Faith Reporting

All reports shall be made honestly and in good faith. A person making a report is not required to prove the allegation but must have reasonable grounds to believe that the information disclosed is true or likely to be true. Individuals who make reports in good faith shall be protected from retaliation in accordance with the Whistleblowers Protection Act Cap 34 and this Policy.

8.5 Protection of Whistleblowers

In accordance with the Whistleblowers Protection Act Cap 34 the organisation shall protect any whistleblower who makes a disclosure in good faith from;

- Dismissal.
- Demotion.
- Harassment.
- Intimidation.
- Victimization.
- Discrimination.
- Retaliation of any kind.

Any retaliation against a whistleblower shall constitute a serious misconduct and may result in disciplinary action including termination of employment or contract.

8.6 False or Malicious Reports

This is a situation when a person knowingly making false, misleading, malicious, or vexatious allegations which shall constitute misconduct and may result in disciplinary or legal action.

8.7 Confidentiality

All reports shall be handled confidentially and shared only with persons who require the information for investigation or legal compliance purposes.

Unauthorized disclosure of whistleblower information is prohibited and may result in disciplinary action.

9. INVESTIGATION PROCEDURES

UCOBAC shall ensure that all allegations are investigated fairly, independently, promptly, and confidentially.

- a) Reports shall be acknowledged within five (5) working days.
- b) A preliminary assessment shall determine whether a formal investigation is required.
- c) An Investigation Committee shall be appointed by the Executive Director or the Board where senior management is implicated.
- d) Investigations shall be completed within thirty (30) days where practicable.
- e) Investigation findings shall be documented and submitted to the appropriate authority within the organisation.

10. RESPONSE AND DISCIPLINARY MEASURES

UCOBAC shall take all allegations of fraud, bribery, corruption, money laundering, terrorist financing, and related misconduct seriously. Where an investigation establishes, on a balance of probabilities, that an allegation is substantiated, the organisation shall take prompt and appropriate corrective action proportionate to the nature, severity, and impact of the misconduct.

Disciplinary and corrective measures shall be guided by the principles of fairness, due process, proportionality, accountability, and compliance with applicable laws, organizational policies, donor requirements, and contractual obligations.

10.1 Factors Considered in Determining Sanctions

In determining the appropriate disciplinary or corrective action, UCOBAC shall consider the following:

- a) The nature and seriousness of the misconduct.
- b) The actual or potential financial loss suffered by UCOBAC, donors, beneficiaries, or other stakeholders.
- c) Whether the misconduct was intentional, reckless, negligent, or repeated.
- d) The individual's level of responsibility, authority, and trust within the organization.

- e) Whether the misconduct involved abuse of office, conflict of interest, forgery, collusion, concealment, or misrepresentation.
- f) The extent to which the individual cooperated during the investigation.
- g) Any previous disciplinary record or history of misconduct.
- h) The legal, reputational, operational, and donor implications arising from the misconduct.

10.2 Administrative and Employment Sanctions

Where the offender is an employee, intern, volunteer, or Board member, the organisation shall impose one or more of the following disciplinary measures:

a) Verbal Warning

A verbal warning may be issued for minor breaches where there is no evidence of intentional fraud, corruption, or financial loss. The warning shall be documented and placed on the individual's personnel file.

b) Written Warning

A written warning may be issued where misconduct is more serious or where previous corrective actions have failed to achieve compliance. The warning shall clearly specify the nature of the violation, expected corrective actions, and consequences of repeated misconduct.

c) Suspension

An employee may be suspended with half pay, in accordance with applicable employment laws and the organisational Human Resource policy, pending investigation or as a disciplinary measure following substantiated misconduct. A suspension may be imposed where continued presence in the workplace could compromise investigations, organizational operations, or the safety of evidence and witnesses.

d) Demotion or Reassignment

Where appropriate, UCOBAC may reassign responsibilities, remove delegated authority, or demote an employee from a position of trust where misconduct demonstrates poor judgment, negligence, or failure to comply with internal controls.

e) Termination of Employment or Engagement

Employment, volunteer assignments, consultancy agreements, or Board appointments shall be terminated where misconduct involves fraud, bribery, corruption, money laundering, theft, embezzlement, falsification of records, gross misconduct, breach of fiduciary duty, or any conduct that fundamentally undermines trust and confidence in the individual.

10.3 Recovery and Restitution of Losses

Where financial loss, theft, misappropriation, or misuse of organizational resources has occurred, the organisation shall pursue recovery of losses to the fullest extent permitted by law.

Recovery measures may include:

- a) Reimbursement of stolen, diverted, or improperly obtained funds.
- b) Recovery of assets, equipment, or property unlawfully acquired or retained.
- c) Deduction of monies owed to the organization, where legally permissible.
- d) Negotiated restitution agreements.
- e) Institution of civil proceedings for recovery of losses, damages, and associated costs.

The pursuit of restitution shall not preclude criminal prosecution or other disciplinary action.

10.4 Contractual Remedies

Where misconduct involves consultants, contractors, suppliers, implementing partners, or service providers, the organisation may take one or more of the following actions:

- a) Issue formal warnings.
- b) Suspend payments pending investigation.
- c) Require repayment of misused funds.
- d) Terminate contracts for breach of contractual obligations.
- e) Withhold future contract awards.
- f) Recover damages resulting from the misconduct.
- g) Enforce contractual penalties and indemnity clauses where applicable.

10.5 Supplier and Partner Blacklisting

Any supplier, contractor, consultant, or partner found to have engaged in fraud, bribery, corruption, money laundering, collusion, bid-rigging, falsification of records, or other unethical conduct may be blacklisted.

Blacklisting may result through the following measures;

- a) Immediate disqualification from current procurement processes.
- b) Removal from approved supplier or partner databases.
- c) Ineligibility for future engagements with UCOBAC for a specified period or permanently, depending on the severity of the misconduct.
- d) Notification to relevant regulatory bodies, donor agencies, or sector networks where appropriate and legally permissible.

10.6 Donor Notification and Reporting

Where misconduct affects donor-funded programs or resources, UCOBAC shall comply with all donor reporting obligations.

The organization may;

- a) Notify affected donors of confirmed incidents.
- b) Share investigation findings as required under grant agreements.
- c) Implement corrective action plans required by donors.
- d) Cooperate with donor-led audits, reviews, and investigations.

All donor communications shall be coordinated through the Executive Director and the Board where appropriate.

10.7 Referral to Regulatory and Law Enforcement Authorities

Where an investigation reveals evidence of criminal conduct or regulatory breaches the organisation shall refer the matter to the appropriate authorities. Depending on the nature of the offence referrals may be made to the following offices;

- a) The Local Council I Chairperson in the respective area.
- b) The Uganda Police Force.
- c) The Financial Intelligence Authority (FIA).
- d) Other competent regulatory or enforcement bodies.

UCOBAC shall cooperate fully with investigations conducted by any competent authorities and shall provide access to relevant records and information as required by law.

10.8 Civil Recovery Proceedings

In addition to disciplinary and criminal measures, UCOBAC reserves the right to institute independent civil proceedings against any person or entity responsible for losses, damages, reputational harm, or breaches of contractual obligations.

Civil remedies may include the:

- a) Recovery of misappropriated funds.
- b) Recovery of property and assets.
- c) Compensation for damages suffered by the organization.
- d) Recovery of legal costs and expenses.
- e) Injunctive relief to prevent further losses or unauthorized use of organizational resources.

10.9 Documentation and Record Keeping

All disciplinary actions, corrective measures, investigation reports, correspondence, and decisions arising from substantiated allegations shall be documented and retained in accordance with the organisation's records management policies and applicable legal requirements. Records relating to fraud, bribery, money laundering, and whistleblowing cases shall be kept securely and treated as confidential.

11. COMPLIANCE WITH ANTI-MONEY LAUNDERING REQUIREMENTS

The organisation shall conduct;

- a) Customer Due Diligence (CDD) and Know Your Customer (KYC), shall be conducted through conducting appropriate due diligence and identity verification of donors, partners, suppliers, beneficiaries, contractors, and other relevant stakeholders to understand their identity, activities, source of funds where necessary, and potential risk exposure.
- b) Monitoring financial transactions and activities to identify unusual, suspicious, or potentially illicit conduct and ensuring that organizational funds are used solely for legitimate and authorized purposes.
- c) Maintaining complete, accurate, and up-to-date financial, transactional, and due diligence records and retaining such records for the periods prescribed by law, donor requirements, and organizational policies.
- d) Reporting suspicious transactions, activities, or concerns to the Financial Intelligence Authority (FIA) and other competent authorities as required by applicable laws and regulations.
- e) Providing regular training and guidance to employees, Board members, volunteers, and other relevant persons to ensure awareness of AML obligations, reporting procedures, and indicators of money laundering, terrorism financing, fraud, and other financial crimes.
- f) Periodic assessment of money laundering and financial crime risks and implement appropriate controls, monitor mechanisms, and identify mitigation measures to address identified vulnerabilities.

12. MONITORING, AUDIT AND REVIEW THE ORGANISATIONAL;

- a) Conduct Internal audits annually.
- b) Monitor and review compliance measures periodically in the organisation.
- c) Report suspicious incidents to the Board.
- d) Conduct policy reviews shall every two to three years or earlier where legal or operational changes require revision.

13. ENFORCEMENT

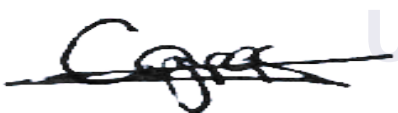

This policy forms part of the organisation’s governance framework and shall be binding upon all persons to whom it applies. Failure to comply with this policy may result in disciplinary action, termination of employment or contract, recovery of losses and any other remedies available under applicable law.

All employees, Board members, volunteers, consultants, contractors, and partners shall acknowledge receipt of and commitment to comply with this Manual.

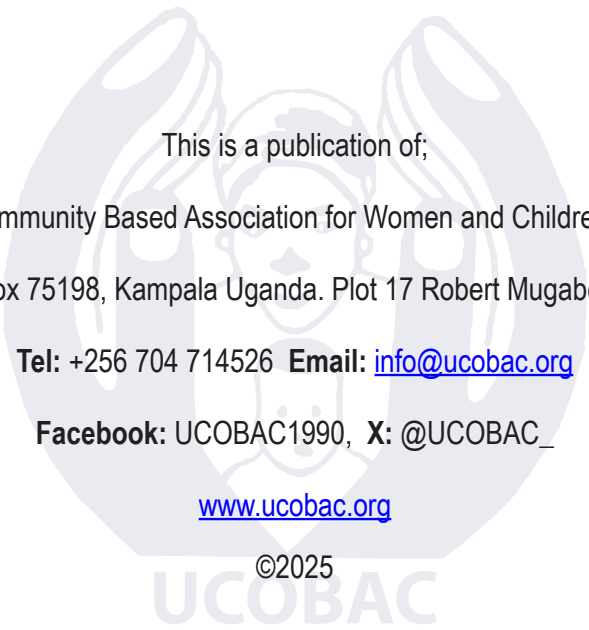
14. APPROVAL OF THE UCOBAC FRAUD, BRIBERY AND ANTI-MONEY-LAUNDERING POLICY (AMLPL)

This Policy shall take effect immediately upon approval and shall remain in force until revised or revoked by the Board of Directors.

Approved by:

<p>Name: Grace Angeline Chelimo Title: Board Chairperson</p>  <p>Signature</p>	<p>Name: Frances Birungi Odong Title: Executive Director</p>  <p>Signature</p>
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