ANNEX 9 – ANTI-FRAUD AND ANTI-CORRUPTION POLICY

Applicable to the procurement and performance of the Beledweyne Feasibility Study

Tender Reference: WARDI/Caritas/Feasibility study/Beledweyn /Process-001/2026

1. Purpose and application

This annex sets out minimum anti-fraud, anti-bribery and anti-corruption requirements applicable to all bidders, consultants, consortium members, subcontractors and personnel involved in the procurement and execution of this feasibility study. It supplements the Terms of Reference and contract. It is a tender-specific compliance annex and does not replace WARDI's approved organizational policies or applicable donor rules.

2. Prohibited practices

Fraud: Knowingly or recklessly misrepresenting or concealing material facts, including false qualifications, forged documents, fabricated field data, inflated invoices, or misrepresented costs.

Bribery and corruption: Offering, soliciting, promising, giving or accepting money, gifts, favours, kickbacks or other improper advantages to influence procurement, approvals, payment or project decisions.

Collusion: Coordinating bids, prices, allocation of work or other arrangements intended to undermine fair competition.

Coercion and obstruction: Threatening or pressuring another party; destroying, altering or withholding records; or obstructing authorized audit, review or investigation.

Conflicts of interest: Failing to disclose actual, potential or perceived relationships or interests that could compromise impartiality.

3. Bidder and consultant obligations

• Submit truthful, complete and verifiable proposals, credentials, references, budgets and supporting documents.

• Disclose all relevant conflicts of interest immediately and refrain from improper contact with evaluators or decision-makers.

• Maintain accurate financial, procurement, attendance, travel, fieldwork and research records; do not falsify or fabricate research results.

• Ensure personnel, agents and subcontractors understand and comply with these requirements and with applicable WARDI and donor codes of conduct.

• Do not offer facilitation payments, commissions or personal benefits to WARDI staff, public officials, community representatives or other stakeholders.

• Protect confidential bid information, personal data and proprietary project information.

4. Reporting and protection against retaliation

Suspected fraud, corruption, bid interference or other misconduct may be reported confidentially to WARDI at procurement@wardi.org or through the toll-free hotline 2089. Reports should identify the tender reference and describe the concern with available evidence. Reports involving the procurement focal person shall be referred to an independent authorized WARDI officer. WARDI shall handle allegations impartially, restrict information to persons with a legitimate need to know and prohibit retaliation against good-faith reporters.

5. Review, cooperation and records

WARDI may verify declarations, supporting records and deliverables and refer allegations for independent review in accordance with applicable procedures. Bidders and consultants shall cooperate with lawful reviews and authorized donor or regulatory audits, preserve relevant records for the period specified in the contract and applicable donor requirements, and respect confidentiality and due process.

6. Consequences of non-compliance

Where substantiated and permitted by the tender conditions, contract and applicable law, misconduct may lead to bid rejection, contract termination, recovery of improperly paid amounts, referral to competent authorities, and other appropriate remedies. Any exclusion or sanction shall follow applicable procedures and donor requirements.

7. Declaration and undertaking

We confirm that we have read and understood this annex; that our bid and supporting documents are accurate to the best of our knowledge; that we have disclosed relevant conflicts of interest; and that we will comply with these requirements throughout the tender and any resulting contract. We understand that a false declaration may result in action under the tender and contract conditions.

Name of bidder/consultancy firm: _____

Authorized representative: _____

Position/title: _____

Signature and company stamp: _____

Place and date: _____