BOARD RESOLUTION
ADOPTION OF CORE POLICY HANDBOOK

Date: 20 March 2026

The Anthropos Africa Board resolves to adopt with immediate effect the Anthropos Core Policy Handbook (v1.0) attached hereto.

The policies shall apply across all Anthropos Africa, Anthropos & Anthropos UK entities and operations.

Management is authorised to implement these policies.



Chair Signature: _____

ANTHROPOS AFRICA

POLICY HANDBOOK

Approved by the Board by written resolution on: 20 March 2026

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1. INTRODUCTION

1.1 Purpose

This handbook sets out the core policies governing the operations of Anthropos Initiatives and Anthropos Africa ("Anthropos"). It is designed to ensure:

- Compliance with donor and regulatory requirements
- Strong financial and ethical management
- Protection of communities and stakeholders
- Proportionate governance appropriate to a small organisation

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1.2 Scope

These policies apply to:

- Trustees and directors
- Staff and consultants
- Partner organisations and contractors

1.3 Guiding Principles

Anthropos adopts a policy framework that is:

- **Proportionate** to organisational size and risk
- **Practical** for field-based implementation
- **Transparent and accountable**
- **Respectful of community realities and structures**

2. SAFEGUARDING POLICY

2.1 Policy Statement

Anthropos has zero tolerance for all forms of abuse, exploitation, or harm to vulnerable individuals and communities.

2.2 Scope

Applies to:

- Children
- Vulnerable adults
- Marginalised and remote communities

2.3 Standards of Behaviour

All personnel must:

- Treat all individuals with dignity and respect
- Avoid any form of exploitation or coercion
- Maintain appropriate professional boundaries
- Act in culturally sensitive and respectful ways

2.4 Prohibited Conduct

- Sexual exploitation or abuse
- Abuse of power
- Harassment or intimidation
- Any form of discrimination

2.5 Reporting

Concerns must be reported to the designated Safeguarding Lead or any Director. The Safeguarding Lead for Anthropos Africa is Michael Taylor.

- Reports may be made confidentially
- All reports will be taken seriously and investigated

2.6 Responsibilities

- All personnel: duty to report concerns
- Safeguarding Lead: manage cases and escalation
- Board: oversight

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3. FINANCIAL CONTROLS & PROCEDURES POLICY

3.1 Purpose

To ensure proper stewardship, transparency, and accountability in the use of funds.

3.2 Financial Authority

- All expenditure must be approved by an authorised individual
- Every payment from the organisation's bank accounts requires two authorised signatories (see section 8.3)
- Delegated authority levels approved by the Board (see section 8.2)

3.3 Budget Management

- Expenditure must comply with Donor requirements and restricted grants will only be used for their designated purpose
- Expenditure must align with approved budgets
- Material variances above the limit in section 8.2 require Board approval

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3.4 Payments & Banking

- Payments made via bank transfer wherever possible
- Cash use minimised and controlled
- Bank accounts held in the organisation's name

- A separate bank account for each donor grant, unless the donor agrees otherwise (see section 8.3)

3.5 Verification of Payees (KYC)

Anthropos adopts a proportionate, risk-based approach:

Minimum requirements:

- Confirm identity of all payment recipients
- Ensure bank account aligns with recipient name

By category:

- Individuals: name + contact + bank verification
- Community groups: leadership confirmation and community validation
- Suppliers/consultants: basic identity and legitimacy verification

Flexibility:
Where formal documentation is limited, verification may include:

- Community recognition
- Known leadership structures
- Project-level oversight

3.6 Verification of Donors (KYC)

Anthropos is committed to ensuring that all funding received is from legitimate, lawful, and ethically appropriate sources and adopts a **risk-based and proportionate approach** to donor verification, ensuring:

- Compliance with applicable laws and regulations (including anti-money laundering principles)
- Protection of organisational reputation and integrity
- Alignment with Anthropos' mission and values
- Practicality given the organisation's size and operating contex

This policy applies to all funding received by Anthropos, including:

- Grants from foundations and institutional donors
- Contributions from governments and public bodies
- Donations from individuals
- Funding received through partnerships or intermediaries

Prior to accepting funding, Anthropos will undertake reasonable checks to confirm:

- **Identity of the donor** (individual or organisation)
- **Source of funds**, where relevant and proportionate
- **Legitimacy of the organisation**, where applicable
- **Consistency with Anthropos' mission and ethical standards**

The level of due diligence will vary depending on the nature and size of the funding:

Low Risk (e.g. established institutional donors)

- Basic verification of donor identity
- Confirmation of organisational legitimacy (e.g. well-known foundation or government entity)

Medium Risk (e.g. new foundations or intermediaries)

- Review of organisational background
- Confirmation of governance structure
- Basic online and reputational checks

Higher Risk (e.g. large or unusual donations, private individuals, new entities)

- Enhanced due diligence, which may include:
    - Verification of source of funds
    - Additional background checks
    - Review of any potential political exposure
    - Consideration of reputational risks

Anthropos will not accept funding where:

- The source of funds cannot be reasonably verified
- The funds are suspected to be linked to illegal activity
- Acceptance would compromise Anthropos' independence, integrity, or mission
- Conditions attached to funding are inconsistent with Anthropos' objectives or ethical standards

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3.7 Expenses

- Receipts required where possible
- Subsistence and per diem rates as set out in section 8.2

3.8 Record Keeping

- Maintain clear audit trail
- Store records securely (digitally where possible)

- Keep all financial records and supporting documents for at least seven years
- Back up accounting records in accordance with section 8.4

3.9 Selection & Engagement of Consultants and Service Providers

Given the specialised nature of Anthropos' work, a competitive procurement process may not always be appropriate.

Anthropos therefore adopts a **justification-based selection approach**:

- Consultants and service providers may be selected based on:
    - Specialist expertise
    - Established track record
    - Context-specific knowledge (e.g. language, community relationships)
- In such cases:
    - A brief written justification must be recorded
    - Fees must be assessed as reasonable and proportionate
    - Conflicts of interest must be declared and managed
- Where multiple qualified providers exist, comparative consideration should be undertaken where feasible

- Purchases of goods and other services follow the procurement rule in section 8.6

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4. ANTI-FRAUD, BRIBERY & CORRUPTION POLICY

4.1 Policy Statement

Anthropos has zero tolerance for fraud, bribery, or corruption.

4.2 Definitions

- Fraud: misuse of funds or assets
- Bribery: offering/receiving improper advantage
- Corruption: abuse of entrusted power

4.3 Prohibited Conduct

- Offering or accepting bribes
- Facilitation payments
- Misuse of organisational funds

4.4 Gifts & Hospitality

- Must be reasonable and proportionate
- Must not influence decisions

4.5 Reporting

All suspicions must be reported immediately.

4.6 Investigation

- Prompt and fair investigation
- Escalation to Board where necessary

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5. CONFLICT OF INTEREST POLICY

5.1 Policy Statement

All individuals must act in the best interests of Anthropos Africa and its stated objects as outlined in its constitution and avoid conflicts of interest.

5.2 Definition

A conflict arises where personal or external interests could influence decision-making.

5.3 Requirements

- Declare all relevant interests
- Maintain a register of interests
- Update declarations regularly

5.4 Management

Where conflicts arise:

- Declare immediately
- Withdraw from decision-making
- Record in meeting minutes

5.5 Specific Application

Applies to:

- Relationships between Anthropos entities
- Consultancy and contracting arrangements

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6. DATA PROTECTION & PRIVACY POLICY

6.1 Policy Statement

Anthropos is committed to responsible and lawful handling of personal data.

6.2 Principles

- Lawful, fair, and transparent use
- Data minimisation
- Secure storage
- Limited retention

6.3 Consent

- Informed consent required for data collection
- Special care for vulnerable populations

6.4 Sensitive Data

Particular care required for:

- Community-level data
- Personal or identifiable information

6.5 Data Sharing

- Only where necessary and appropriate
- With safeguards in place

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7. WHISTLEBLOWING POLICY

7.1 Policy Statement

Anthropos encourages reporting of wrongdoing and protects those who do so.

7.2 What Can Be Reported

- Fraud or corruption
- Safeguarding concerns
- Misconduct or unethical behaviour

7.3 Reporting Channels

- Line manager
- Any Director, or the Chair of the Board

7.4 Protection

- No retaliation against whistleblowers
- Confidential handling of reports

7.5 Investigation

- Timely and impartial
- Findings documented
- Appropriate action taken

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8. FINANCIAL PROCEDURES

8.1 Purpose

This section sets out the financial procedures of Anthropos Africa, in proportion to its size. It gives effect to the financial provisions of the Constitution and to section 3. Where a funding agreement sets stricter requirements, those apply to that grant.

8.2 Limits and Rates

The Board sets limits for and reviews these each year.

- **Spending within an approved budget:** approved by the Managing Director above that, or outside the budget, by the Board (or two Directors between meetings).
- **Contracts and consultancy agreements:** signed by the Managing Director above that, by the Managing Director and the Chair.
- **Budget variance needing Board approval**
- **Per diem in Botswana (meals and incidentals):**
- **Accommodation:** receipted costs
- **International travel:**
- **Private vehicle use:**

8.3 Banking and Payments

- All bank accounts are in the name of Anthropos Africa. A separate account is held for each donor grant unless the donor agrees otherwise.
- Every bank payment needs two of the signatories approved by the Board. One prepares the payment, the other approves it. No one approves a payment to themselves.
- Anthropos Africa does not keep petty cash. Small expenses (fuel, field purchases) are paid with a company debit cards held and the card statement is reconciled monthly against receipts.
- Where cash is unavoidable (e.g. in remote areas), an advance is approved by the Managing Director (or a Director, if the Managing Director is to receive it) and settled within working days with receipts or signed declarations.

8.4 Accounts and Records

- Accounts are kept in double-entry accounting software coded by donor, project and budget line, and brought up to date monthly.

- Each bank account is reconciled monthly, and the reconciliation is checked and signed by the Managing Director or a Director who did not prepare it.
- Shared costs (staff time, rent, administration) are allocated to projects as set out in each project budget.
- Records and supporting documents are kept for at least seven years

8.5 Expenses

- Expense claims are made within 30 days with receipts and approved by someone other than the claimant.
- Where there is no receipt (e.g. taxis, bus fares, purchases in remote areas), the claimant signs a declaration of the amount, date, purpose and payee.

8.6 Procurement

- Above the threshold in section 8.2, three written quotations are obtained, or the reason for not doing so is recorded. Consultants may be selected under section 3.9.
- Anyone with a conflict of interest takes no part in the decision. Purchases must not be split to avoid the threshold.

8.7 Staff, Consultants and Directors

- Every employee and consultant has a written contract.
- Payrolls require two signatories. PAYE and withholding tax are paid to BURS on time.
- Payments to Directors for services follow the Constitution.

8.8 Assets and Vehicles

- A simple list is kept of assets above the threshold in section 8.2.
- A logbook is kept for each vehicle, and fuel use is checked quarterly by the Managing Director.

8.9 Budget, Reporting and Audit

- The Board approves an annual budget before the start of each financial year.
- At each quarterly meeting the Board receives a short financial update: spending against budget, cash position and any significant variances.
- Donor reports are reviewed by the Managing Director before submission.
- The accounts are audited where the Companies Act, the Board or a funding agreement requires it, and the Board considers any letter from the auditor.

8.10 Grants and Transactions Between Anthropos Entities

- Grants to partner organisations are made under a written agreement and released in instalments against reports.
- Services and transfers between Anthropos Initiatives (UK) and Anthropos Africa are covered by written agreements.

9. IMPLEMENTATION & REVIEW OF POLICIES

9.1 Responsibility

- Board: oversight
- Management: implementation
- All personnel: compliance

9.2 Training

Policies will be communicated to all personnel and partners as appropriate.

9.3 Review

This handbook will be reviewed annually or as required.
