



POLICY ON ANTI-CORRUPTION, CONFLICT OF INTEREST, MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM

The National Environment Management Authority (NEMA) is firmly committed to safeguarding public funds, assets, information, and data entrusted to it, and to upholding the highest standards of integrity, accountability, transparency, and ethical conduct. NEMA adopts a **zero-tolerance stance** toward all forms of fraudulent, corrupt, unethical, and unlawful practices, including money laundering, cyber-enabled financial crimes, and financing terrorism.

In furtherance of this commitment, the Authority shall implement and continuously strengthen comprehensive measures to prevent, detect, investigate, and respond to fraud, corruption, conflict of interest, money laundering, and related offenses, including but not limited to the following:

- Establishing, maintaining, and continually improving effective systems of internal control, including financial and ICT controls;
- Conducting regular and systematic risk assessments to identify, assess, and mitigate potential risks;
- Integrating anti-corruption, anti-money laundering, and counter-financial crime measures into all operational, administrative, procurement, licensing, permitting, and revenue-related processes;
- Establishing clear, formal, secure, and transparent procedures for the reporting, investigation, and resolution of allegations of fraudulent, corrupt, money laundering, or cyber-related misconduct, including mechanisms for the protection of whistleblowers;
- Taking timely, appropriate, and lawful action in response to all allegations, including reporting suspected money laundering activities to relevant oversight, investigative, and law enforcement agencies in accordance with applicable laws;
- Where allegations are substantiated, instituting disciplinary measures in accordance with the Authority's Human Resource Policies and Procedures, and pursuing civil recovery and/or criminal prosecution where applicable;
- Ensuring that all employees, contractors, and agents are adequately informed of, and comply with, their obligations relating to the prevention of fraud, corruption, money laundering, and cybercrime;
- Promoting and sustaining an ethical organizational culture in which integrity, accountability, transparency, and lawful financial conduct are upheld, and in which fraudulent, corrupt, or illicit financial activities are actively discouraged; and



- Enhancing public awareness of the Authority's commitment to the prevention and eradication of fraud, corruption, money laundering, and cyber-enabled crimes.

In addition, the Authority is committed to fully implementing and being in compliance with the National policy and legislative framework on anti-corruption, conflict of interest, anti-money laundering, and ethical conduct, including but not limited to:

- Anti-Corruption and Economics Crimes Act (ACECA) of 2003;
- Leadership and Integrity Act, 2012;
- Public Officers and Ethics Act, 2003;
- Public Procurement and Asset Disposal Act, 2015;
- The Proceeds of Crime and Anti-Money Laundering (Amendment) Act, 2012;
- Public Finance and Management Act (PFMA) of 2012;
- Computer Misuse and Cybercrimes Act, 2018

The Authority has put in place the necessary institutional policies to operationalize the national framework on anti-corruption, conflict of interest, anti-money laundering, and ethical conduct, including:

- Anti-corruption policy
- Whistle blower policy
- Anti-Money Laundering and Countering the Financing of Terrorism
- NEMAs Finance and Procurement Manual
- NEMA's Code of Conduct Policy
- Internal Audit Charter
- Human Resources Manual

Through the effective implementation of these policies, NEMA seeks to safeguard its resources, protect the integrity of its financial and information systems, preserve public confidence, and ensure the transparent, accountable and lawful execution of its statutory mandate.

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