TWO BOOKS ONE PEN
ENHANCEMENT INITIATIVE (TBOP)

Ethics, Anti-Corruption and Financial Integrity Policy

Redefining ideas for systems change in learning

Document control	
Policy owner	Executive Director / Founder
Approved by	Board of Trustees
Version	1.0
Date approved	21st October 2026
Effective date	21st October 2026
Next review	[October 2027] (annually, or sooner – see Section 14)
Applies to	Trustees, Advisory Board members, staff, volunteers, interns, consultants, partners, suppliers and anyone acting for TBOP
Related policies	Safeguarding and Child Protection Policy; Code of Conduct; Data Protection Policy; Finance Procedures; Volunteer Handbook

> **How to read this document**
> This policy is written in plain language so that every trustee, staff member and volunteer can understand and apply it. Where it says **must** or **never**, it is a rule. Where it says **should**, it is expected good practice.

1. Introduction

Two Books One Pen Enhancement Initiative (TBOP) began in 2018 as an act of community service in Giza, Nasarawa State, and was registered with the Corporate Affairs Commission in 2024 as a Nigerian non-profit with a Board of Trustees and an Advisory Board. Our work is guided by four pillars: **Access & Literacy, Media & Information Literacy, Civic Resilience** and **Systems Engagement**. We deliver this through programmes such as Mentorship Pairings, Karanta (book, press and debate clubs), Skills for All, Bridge Builders and She Leads.

Our work takes us into public schools, brings us into contact with education authorities, and involves partners, donors, volunteers and – most importantly – children and young people. We collect and distribute donated money, books and stationery on behalf of others, and we report on what that support achieved.

Trust is the foundation of everything we do. This policy sets out the standard of honesty and accountability TBOP holds itself to, and that anyone – a donor, a school, a parent or a child – can hold us to.

2. Purpose

This policy exists to:

- set clear, shared standards of ethical behaviour for everyone who works with or for TBOP;
- prevent bribery, corruption, fraud, money laundering and the misuse of resources;

- make sure every naira, book and pen given to TBOP reaches the purpose it was given for;
- protect the children, schools and communities we serve, and the donors and partners who support us;
- help people recognise problems early and report them safely; and
- keep TBOP compliant with Nigerian law and recognised international standards.

> **Standards this policy is aligned with**
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> **Nigeria:** Corrupt Practices and Other Related Offences Act 2000; Economic and Financial Crimes Commission (Establishment) Act 2004; Money Laundering (Prevention and Prohibition) Act 2022; Terrorism (Prevention and Prohibition) Act 2022; Companies and Allied Matters Act 2020 (Part F – Incorporated Trustees); Nigeria Data Protection Act 2023.
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> **International:** UN Convention against Corruption (UNCAC); UK Bribery Act 2010 and US Foreign Corrupt Practices Act (relevant to funding from those jurisdictions); FATF Recommendation 8 on non-profit organisations; ISO 37001 (anti-bribery management) principles.
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> Where Nigerian law, a donor agreement and this policy set different standards, **the strictest standard applies.**

3. Scope

Who it covers. This policy applies to everyone who acts for or on behalf of TBOP, whether paid or unpaid, full-time, part-time, hybrid or remote:

- members of the Board of Trustees and the Advisory Board;
- the Executive Director, staff, interns and volunteers;
- consultants, resource persons and facilitators;
- partners, fiscal sponsors, suppliers and service providers, through their agreements with TBOP.

What it covers. All TBOP activities and resources, wherever they take place – school outreaches and clubs, book and stationery drives, mentorship, events, grant applications and reporting, fundraising (including online and mobile-money giving), procurement, partnerships and communications.

Interim arrangements. While TBOP completes the opening of its own bank account and its SCUML registration, any funds managed for TBOP through a fiscal sponsor or other formally agreed arrangement are fully covered by this policy. TBOP funds must never be held in any individual's personal account.

4. Guiding Principles

Principle	What it means in practice
Integrity	We are honest in what we say, record and report – even when the truth is inconvenient.
Zero tolerance	We do not offer, pay, ask for or accept bribes, in any amount, for any reason.
Transparency	Our decisions, spending and results can be explained and shown to anyone with a legitimate interest.
Accountability	Every person is responsible for their own conduct and for the resources in their care.
Stewardship	Donated money and goods are held in trust. We use them carefully for their stated purpose and get good value.
Fairness	We choose schools, beneficiaries, volunteers, partners and suppliers on merit and need – not on connections.
Best interests of the child	No benefit to TBOP or any individual ever outweighs the safety and dignity of the children we serve.
Speak up	Raising a concern in good faith is always the right thing to do, and is protected.

> **The quick test – if in doubt, ask yourself:**
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> Is it legal? Is it in line with this policy? Would I be comfortable if our donors, the school, the parents or the newspapers knew about it? Could I explain it openly to the Board?
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> If the answer to any of these is "no" or "I'm not sure", **stop and ask** the Executive Director or a designated Trustee before acting.

5. Prohibited Conduct

The following are never acceptable. Each is treated as serious misconduct:

- offering, promising, giving, requesting or accepting a bribe or any improper advantage;
- making "facilitation" or "speed-up" payments, sometimes described as "settlement", "PR" or "something for the boys";
- fraud, theft or misuse of TBOP funds, donations, books, stationery, equipment or data;
- receiving TBOP money or donations into a personal bank, mobile-money or online account;
- falsifying or inflating receipts, invoices, attendance lists, distribution records, photos or reports to donors;
- charging the same cost to more than one donor ("double-funding") without disclosure and approval;
- selling, diverting or keeping donated items for personal use;
- using a TBOP role, the TBOP name, or access to schools and children for personal, commercial or political gain;
- hiding a conflict of interest, or favouring relatives and friends (nepotism);
- asking a child, parent, school or community for money, favours or anything else in return for TBOP support – including any form of sexual exploitation or abuse;
- money laundering, terrorist financing, or knowingly dealing with sanctioned people or organisations;
- using TBOP funds or resources to support a political party or candidate;
- retaliating against anyone who raises a concern; and
- covering up, ignoring, or helping someone else to do any of the above.

6. Anti-Bribery and Anti-Corruption Standards

6.1 Zero tolerance

A bribe is anything of value – cash, a transfer, airtime, a gift, a favour, a job, a contract or a promise – given or received to improperly influence a decision. TBOP prohibits bribery with **public officials and private individuals alike**, in Nigeria and anywhere else.

6.2 Dealing with public officials and schools

TBOP regularly works with public bodies such as the FCT Universal Basic Education Board, the Secondary Education Board, school principals and teachers, as well as regulators such as the CAC, tax authorities and SCUML.

- Approvals, permits and registrations must be obtained only through official channels.
- Official fees must be paid only into official accounts, against an official receipt.
- No payment, gift or favour may be offered to secure access to a school, speed up an approval or influence the selection of a school or students.
- Approved, budgeted support to schools (for example refreshments at an event or materials for a club) must be documented and given to the school, not to an individual.

6.3 Facilitation payments and threats to safety

Facilitation payments are banned. The **only** exception is where a person faces an immediate threat to their life, liberty or physical safety. In that case, personal safety comes first: make the payment, leave safely, and report it to the Executive Director or a designated Trustee within 24 hours so it can be recorded and addressed. No one will be penalised for acting to protect their safety.

6.4 Gifts, hospitality and payments to resource persons

Modest, open courtesy is part of our culture and is allowed. Anything that could look like a reward for a decision is not.

Category	Rule
Acceptable	Token items such as TBOP-branded materials, books, light refreshments at events, or a courtesy gift worth up to [₦100,000] per person. Must be recorded in the Gifts and Hospitality Register.
Needs prior written approval	Any gift or hospitality worth more than [₦1,000,000]; any gift to or from a public official beyond token items; paying travel or accommodation for anyone outside TBOP. Approved by the Executive Director – or the Board Chair where the Executive Director is involved.
Never allowed	Cash or cash equivalents (transfers, airtime, vouchers); anything given during a grant, procurement or selection decision; anything offered secretly; anything given or received to secure an approval or a place in a programme.
Not a gift	Honoraria, transport refunds or allowances for teachers, facilitators and resource persons are payments, not gifts. They must be budgeted, agreed in advance, paid by transfer where possible, and receipted and properly documented.

6.5 Donations and sponsorships made by TBOP

TBOP does not make political donations. Any charitable donation or sponsorship made by TBOP must serve our mission, be approved in line with Section 7, and be publicly recordable.

7. Financial Integrity and Accountability

7.1 Organisational accounts only

- All TBOP income must go into a bank account in TBOP's registered name, opened by Board resolution, with at least two authorised signatories required for every payment.
- Until that account is operational, funds may only be received through a written, board-approved arrangement (such as a fiscal sponsor). Personal accounts must never be used.
- TBOP must register online fundraising pages, mobile-money, and payment platforms in its name, with login details held by at least two authorised people.

7.2 Separation of duties and approval limits

No single person should request, approve, pay and record the same transaction. Where the team is small, a designated Trustee acts as the second check.

Value of spend (within approved budget)	Who approves
Up to [₦500,000]	Executive Director
[₦500,001 – ₦1,000,000]	Executive Director and one designated Trustee
Above [₦1,000,000], or any spend outside the approved budget	Board of Trustees (or two Trustees in writing, reported at the next Board meeting)

7.3 Cash, records and reporting

- Cash should be avoided. Any petty cash float is limited to [₦50,000], kept by a named custodian, and reconciled monthly.
- Every receipt of income and every payment must be supported by documents: invoice, receipt, approval and proof of payment.
- Records must be kept for at least six years, or longer if a donor or the law requires.

- Restricted funds are used only for the purpose agreed with the donor. Any change needs the donor's written approval.
- Budgets are reviewed against actual spending monthly, and donor reports must be accurate, complete and on time.
- TBOP prepares annual financial statements, files its annual returns with the CAC, arranges an independent review or audit as required by law or donors, and publishes a summary in its annual report on twobooksonepen.org.

7.4 In-kind donations (books, stationery and supplies)

- All donated items are logged in the Donations Register: donor, item, quantity, estimated value and date received.
- Distribution to schools or students is recorded on a distribution list signed by a school representative.
- Unused stock is counted, recorded and stored securely for future programmes – never kept or sold by individuals.
- Photos used as evidence of distribution must follow TBOP's safeguarding and consent rules for children.

8. Anti-Money Laundering and Counter-Terrorist Financing Principles

Non-profits can be misused to move or disguise illegal money. In line with the Money Laundering (Prevention and Prohibition) Act 2022, the Terrorism (Prevention and Prohibition) Act 2022 and FATF Recommendation 8, TBOP applies a proportionate, risk-based approach:

- **Know your donor:** identify and record any donor giving more than [₦1,000,000] in a year, any foreign donor, and any donor whose identity or source of funds is unclear.
- **No large anonymous or cash gifts:** TBOP does not accept anonymous donations above [₦100,000] or cash donations above [₦200,000].
- **Screen key parties:** check major donors, partners and suppliers against relevant sanctions lists, including the UN Security Council Consolidated List and Nigerian sanctions lists.
- **No pass-through money:** TBOP does not accept funds to pass on to a third party unless the purpose is clear, documented and approved by the Board.
- **Comply and report:** TBOP maintains its SCUML registration and meets its reporting duties. A designated Compliance Officer reports suspicious transactions to the Nigerian Financial Intelligence Unit (NFIU) as the law requires. Never warn ("tip off") a person that a report has been or may be made.

> **Red flags – stop and report if a donor or partner:**
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> sends more than agreed and asks for a refund, especially to a different account; insists on cash or unusual payment routes; refuses to identify themselves or explain where funds come from; attaches conditions that have nothing to do with our mission; or asks TBOP to pass money on to someone else.

9. Conflict of Interest

A conflict of interest arises when a personal interest – yours, or that of a family member, close friend or another organisation you are connected to – could affect, or appear to affect, a TBOP decision. **Having a conflict is not wrong. Hiding it is.**

Examples in our context:

- buying stationery or printing from a business owned by you or a relative;
- recommending a relative or friend as a volunteer, consultant or supplier;
- choosing a school or students where you have a personal connection;
- holding a role in a partner, donor or fiscal-sponsor organisation that TBOP is negotiating or working with;
- using contacts or materials gained through TBOP for your own paid work.

What you must do:

- Declare interests in writing when you join, every year, and whenever a new conflict arises.

- Step out of any discussion or decision where you have a conflict.
- Where TBOP leaders also hold roles in other organisations, those roles must be declared and the person must not take part in TBOP decisions involving those organisations.
- All declarations are kept in the Conflict of Interest Register. Conflicts involving the Executive Director or a Trustee are decided by the Board.

10. Procurement and Third-Party Engagement

10.1 Buying goods and services

Procurement must be fair, competitive, documented and deliver value for money.

Value of purchase	Minimum process
Up to [₦100,000]	One written quote or price check, documented
[₦100,001 – ₦500,000]	At least three written quotes; choice justified in writing
Above [₦500,000]	Competitive process; evaluation by at least two people with no conflict; Board informed

- Purchases must not be split to avoid these thresholds.
- Suppliers are paid by transfer to an account in the same name as the invoice.
- Goods are checked against the order (for example, quantity and quality of books or stationery) before payment is made.
- Anyone involved in a purchase must declare any conflict of interest first.

10.2 Partners, fiscal sponsors, consultants and suppliers

- **Due diligence:** before engaging a third party, check – in proportion to the risk – their registration, reputation, sanctions status and any conflicts.
- **Written agreements:** every partnership, MoU, fiscal-sponsorship or service agreement should include anti-bribery, safeguarding, data protection, accurate reporting, audit-access and termination clauses.
- **Shared responsibility:** partners must tell TBOP promptly if they suspect fraud, corruption or misuse of joint resources.
- **Consequences:** TBOP may suspend or end any relationship where this policy is breached.

11. Whistleblowing and Reporting Concerns

If you know or suspect that this policy has been, is being, or may be broken, you must report it. You do not need proof – only a reasonable, honest belief.

11.1 How to report

Channel	When to use it
Executive Director	Your first point of contact for most concerns.
Designated Trustee / Board Chair	If the concern involves the Executive Director, a Trustee, or you are not comfortable reporting internally first.
Confidential email	Trustee and Advisors
External authorities	ICPC (icpc.gov.ng), EFCC (efcc.gov.ng), the Federal Ministry of Finance whistleblower channel, or a donor's own reporting channel.

Children, parents, teachers and community members may raise concerns with any TBOP team member, or through their school, in any language they are comfortable with. Every concern must be passed on to the Executive Director or designated Trustee the same day.

11.2 Your protection

- Reports are handled confidentially and shared only with those who need to know.
- No one will be dismissed, removed, threatened or disadvantaged for reporting in good faith – even if the concern turns out to be unfounded.
- Retaliation against a whistleblower is itself serious misconduct.
- Knowingly making a false or malicious report is also misconduct.
- Every report is acknowledged within 7 working days

12. Investigations and Disciplinary Measures

12.1 How concerns are investigated

- Every report is assessed within [10 working days] by the Executive Director or designated Trustee – or by the Board where senior people are involved.
- Investigations are fair, confidential, timely and led by someone with no involvement in the matter. Serious cases may use an independent external investigator.
- The person concerned is informed of the allegation and given a fair opportunity to respond.
- Evidence is preserved. A person may be temporarily stood down from duties while an investigation takes place; this is not a finding of wrongdoing.

12.2 Outcomes

- **Staff and volunteers:** retraining, written warning, removal of responsibilities, termination of employment or volunteer agreement, and recovery of losses.
- **Trustees and Advisory Board members:** removal in line with TBOP's constitution.
- **Partners and suppliers:** suspension or termination of agreements and exclusion from future work.
- **Referral:** possible crimes are referred to the appropriate authorities (Police, ICPC, EFCC or NFIU).
- **Donor notification:** donors are informed as required by their agreements.
- **Learning:** every confirmed case leads to a review of controls to prevent it happening again.

13. Governance and Oversight

Who	Responsibility
Board of Trustees	Overall accountability. Approves this policy, appoints a designated Trustee for ethics and finance, approves major spending, and reviews an integrity report at least [twice a year] (incidents, registers, audit findings).
Executive Director / Founder	Leads by example and is responsible for day-to-day implementation, approvals within delegated limits, and reporting to the Board.
Designated Compliance Officer	Oversees anti-money laundering duties, SCUML compliance and any NFIU reporting.
HR & Admin Officer	Keeps the Gifts and Hospitality, Conflict of Interest, Donations and Supplier registers; runs onboarding training; collects signed acknowledgements.
Programme and Communications leads	Apply this policy in their work – including honest reporting of outreach results and lawful, consented use of images.
Advisory Board	Advises in line with this policy and declares any interests.
Everyone	Reads and signs this policy (Annex A), completes induction and annual refresher training, and speaks up about concerns.

Fraud and corruption risks are included in TBOP's risk register and reviewed at least once a year.

14. Policy Review

The Board of Trustees will review this policy at least once a year. An earlier review will take place if:

- relevant Nigerian law or international standards change;
- a serious incident or audit finding reveals a gap;
- a donor or partner introduces new requirements; or
- TBOP's operations change significantly – for example, when its own bank account becomes operational or it expands beyond the FCT.

Version	Date	Summary of changes
1.0	21st Oct 2026	First version adopted by the Board of Trustees

15. Contact Information

Contact	Details
Organisation	Two Books One Pen Enhancement Initiative (TBOP), Abuja, FCT, Nigeria
Website	twobooksonepen.org
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Executive Director	Stephanie O. Adams-Douglas
HR & Admin Officer	Chiamaka Angela Okorie