



PROCUREMENT POLICY

Updated September 2021



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PROCUREMENT POLICY

1 DOCUMENT PURPOSE

This policy outlines SeeBeyondBorders' approach to procurement in all geographic locations and the principles and values which are to be applied to the acquisition of goods and services. The principles governing procurement activities include -:

- Integrity – By obtaining competitive quotations and being accountable for an open, honest and fair procurement process.
- Efficiency – By promoting value for money and ensuring efficient use of SeeBeyondBorders resources.
- Compliance – By ensuring that our procurement activities are compliant with country laws that apply to counter terrorism and financial wrongdoing.
- Risk Mitigation – By ensuring that we recognise financial risks in procurement and take appropriate steps to mitigate such risks in line with our risk management policies.
- Value for Money – By promoting best value for money from suppliers, recognising this is not always the cheapest option, but includes concepts of work quality, guarantees/warranties on goods, and speed of delivery along with price.

2 DEFINITIONS

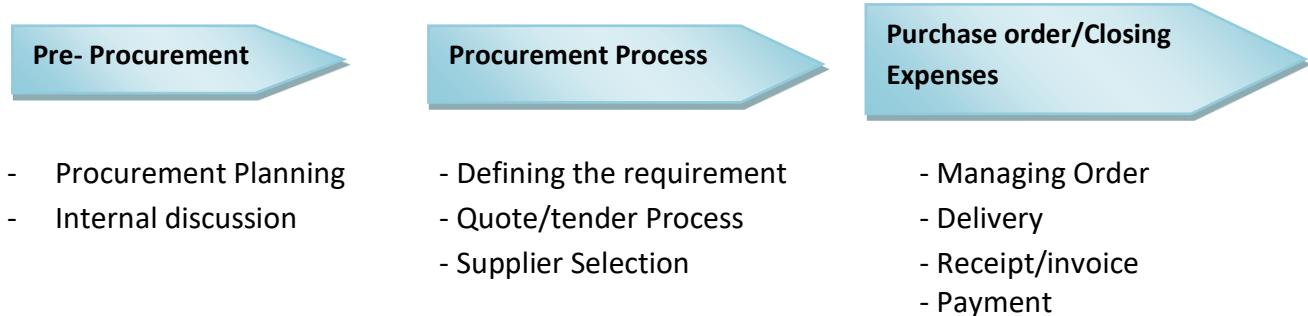
Procurement: The process of ensuring that the goods and services required for the efficient operation of SeeBeyondBorders are authorised, acquired at the best price, are of the required quality and are delivered at the right time.

Goods and Services: Any materials, products, equipment or services purchased for SeeBeyondBorders operations.

Assets: A physical item, with an expected useful life of at least one year and a purchase price of US\$300, or more, per item e.g. computers, motor bikes or office equipment.

2.1 Implementing the principles

The principles of procurement are implemented by using SeeBeyondBorders policies and processes. There are three key stages to procurement:



3 POLICY

3.1 Geographical variations

This policy applies in all the geographic locations in which SeeBeyondBorders operates. Most purchasing is done in Cambodia where staff hold a wider variety of positions including those with specific project responsibilities. The Policy requirements as set out below must be applied as appropriate allowing for these differences in structures in all cases. Where a geographic location does not have a “Country Manager” reference must be made to the senior team member in that location or to Finance in Australia should further clarification be required.

3.2 Authorisation Matrix

Approval for the purchase of all goods and services, including the signing of agreements which result in a commitment for future expenditure, are subject to the limits as specified in the Authorisation Matrix.

SeeBeyondBorders operates different limits for budgeted and unbudgeted expenditure.

3.3 Quotations Requirement

Individual Non Recurring Purchases less than \$US 300 / 500 AUD/ 200 GBP/ 300 Euro do not require quotations. Such purchases shall be subject to expense claim or petty cash controls and approvals

Individual Non Recurring Purchases of more than \$US 300 / 500 AUD/ 200 GBP/ 300 and less than \$US 1,000 /1,500 AUD/800 GBP/ 1,000 Euro per item, will require at least two written (preferred) or documented verbal quotes.

Individual Purchases of \$US 1,000 /1,500 AUD/800 GBP/ 1,000 Euro per item, or more, will require at least three written quotes.

Local currency equivalent applies where purchases are not in US\$, and are shown in *Appendix 1*.

3.4 Program Purchases

Program Managers are required to submit funding requests to the Country Manager, on a monthly basis. A separate form is required for each Project. All projected expenditure, to cover agreed activities is to be listed within this form, broken down by program / activity and expense type.

Any request for one-off, unbudgeted expenditure must be supported by an Activity Proposal Form. This is to be sent to the Country Manager for approval.

The monthly Funding Request is consolidated by the accountant, reviewed by the General Manager HR and Finance and the Country Manager, and then submitted to the Country Director for final approval.

3.5 Asset Purchases

All Asset purchases must be approved prior to procurement; this is achieved through the completion of Procurement Request Form.

All asset purchases will require quotations, which are to be attached / documented on the Capital Expenditure Approval Form.

Approval limits for the Capital Expenditure Approval Form, is as per the Authorisation Matrix.

In the case of motor vehicle purchases it is the responsibility of the General Manager HR and Finance to ensure that SeeBeyondBorders receives the motor vehicle registration card or tax certificate at the time of purchase.

3.6 Ethical Purchasing, Conflict of Interest, Confidentiality, and Counter Terrorism

Sanctions

- Staff involved in procurement must comply in all respects with laws, ethics and SBB's standards of professional conduct, which apply to their purchasing activities. In general, SeeBeyondBorders staff shall work to maintain and enhance high levels of accountability through ethical conduct and conscientious adherence to ethical methods of doing business.
- SBB staff may not select a supplier of goods or services for any reason other than its ability to fulfil the organisation's needs. They may not personally accept any goods or services or other forms of compensation or favours from suppliers, contractors such as fees, commissions accept gifts, rewards or benefits or any form of bribes. All such decisions and actions are unacceptable and prohibited.
- SBB staff must avoid any conflict of interest with suppliers. The procurement process must be transparent and have no actual or perceived appearance of impropriety. Any conflict of interest must be declared and considered in the procurement process.
- SBB staff must avoid any conflict of interest in the procurement approvals process. Staff should avoid approving payment where they are beneficiaries, and/or are related to another staff member in the approvals process. (i.e. two family members cannot approve and or authorise the same transaction).
- No SBB staff is to take advantage of his/her position for private purposes, or solicit or accept gifts, rewards, or benefits that might compromise, or be seen to compromise their integrity.
- All prices and technical information submitted by suppliers are to be kept secure and strictly confidential. Information may be verbal (where allowed) or written, including email. It is a responsibility to ensure that adequate measures have been taken to assure that confidentiality is maintained.
- Where alternate quotes are being considered, these should not be from different branches of the same company. The quotes should be from different companies.
- SBB staff involved in the procurement process must understand the purpose of standard procurement procedures as well as the policies that support these procedures in order to provide a foundation for completed and consistent consideration of all aspects of the purchasing cycle.

- Suppliers of goods or services over the prescribed value in *appendix 1* must be checked against the local country sanctions (i.e. Terrorism) checklist in accordance with Counter Terrorism policy. Where such a list does not exist or is not available to SeeBeyondBorders, then the *Consolidated List* from DFAT (Australia) shall be used. Evidence of such checks must be maintained. The prescribed value will be reviewed annually to ensure a minimum of 80% of expenditure is covered by checks or exemptions. This will be approved by the Finance Audit and Risk Committee.
- There must be a segregation of duties so that staff purchasing goods and services are not also the approver of such purchases.

3.7 Contractors and Consultants

SeeBeyondBorders may engage building contractors or consultants as part of the program or organisation's requirements.

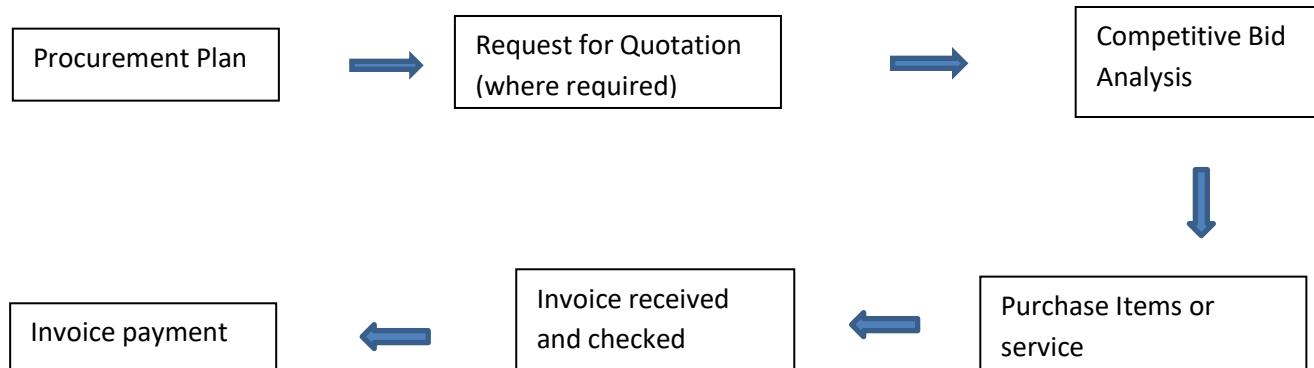
All engagements of contractors or consultants, over \$US 300 / 500 AUD/ 200 GBP/ 300 Euro, will require quotations as per 3.2 above. A written agreement must be signed between the successful supplier and SeeBeyondBorders. In situations where the contracting supplier is planning to use a sub-contractor, this information must form part of the written agreement. It is expected that all sub-contractors will also be provided with and adhere to this policy.

Planned engagement of contractors, or consultants, must be included within the Funding Request and / or the Activity Proposal Form, as appropriate.

3.8 Exception

Where there is only one supplier of any good or service that is reasonably available, approving staff must be satisfied that all avenues have been explored, that they have negotiated a fair price and that SeeBeyondBorders receives value for money. Any such purchases shall be approved by the Country Manager or more senior position, in writing.

3.9 Procurement Process



4 POLICY MANAGEMENT

This Policy has been approved by the Australian Board and the Trustees of SeeBeyondBorders' other entities as noted below.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by senior management. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board. Recommendations for minor changes can be approved by the CEO before the expiry of three years, and recommendations for changes to the background or policy in practice can be approved by the relevant Sub-Committee.

Doc ref	Doc type	Approved by Australian Board Date	Minute ref.	Approved by UK Trustees Date	Minute ref
	Policy Review	Board March 2018			
PP/06/2020 /1.0	Policy Review	Board 29 June 2020	Item 8	21/7/2020	Item 5
PP/09/2020 /2.0	Policy update	Board 16 Sept 2020	Item 8	28/9/2020	File Note 28.9.20
PP/10/2020 /2.1	Policy Amendment	CEO approved	CEO approved	CEO approved	CEO approved
PP/09/2021 /3.0	Policy update	Board 22 Sept 2021	Item 9	9/11/2021	Item 6

Appendix 1 – Procurement Limits

	Cambodia (US\$)	Australia (AU\$)	UK	Ireland/EU
Sanctions List check	New supplier	New supplier	New supplier	New supplier
	>\$300	>\$500	>£200	>€300
No quotation required	<\$300	<\$500	<£200	<€300
2 quotations required	\$300 to <\$1,000	\$500 to <\$1,500	£200 to <£800	€300 to <€1,000
3 written quotations required	\$1,000 and above	\$1,500 and above	£800 and above	€1,000 and above