



អង្គការសិក្សាឆ្លងព្រំដែន
StudyBeyondBorders Organisation

PROCUREMENT POLICY

Change begins with Education

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PROCUREMENT POLICY

1 STUDYBEYONDBORDERS OVERVIEW

StudyBeyondBorders in Cambodia (SBBC) is a local Cambodian non-government organisation operating in rural areas of Battambang and Siem Reap Provinces. The organisation is supported by an alliance of registered development organisations in Australia (SBBA), the UK (SBBUK), and Ireland (SBBI).

SBBC aims to build capability within Cambodian education policy-making, leadership, mentoring, and training to equip and motivate teachers to provide quality education to children. The organisation is committed to supporting systemic change so that educators are proud to work in the teaching profession and are highly respected by parents, communities, and peers. To this end, SBBC conducts programs to mentor education leaders, upskill teachers, engage parents and communities, and develop resources that together enable the delivery of quality education to schoolchildren. The organisation seeks to embed all its work at the school, district, provincial, and national levels.

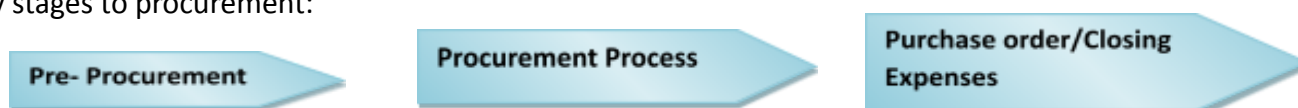
2 DOCUMENT PURPOSE

This policy outlines SBBC's 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 SBBC 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.

2.1 Implementing the principles

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



- | | | |
|------------------------|----------------------------|-------------------|
| - Procurement planning | - Defining the requirement | - Managing order |
| - Internal discussion | - Quote/tender process | - Delivery |
| | - Supplier selection | - Receipt/invoice |
| | | - Payment |

3 DEFINITIONS

Procurement: The process of ensuring that the goods and services required for the efficient operation of SBBC are authorised, acquired at the best price (i.e. value for money), are of the required quality and are delivered at the right time.

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

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

4 POLICY IMPLEMENTATION

4.1 Geographical Variations

This policy applies in all the geographic locations in which SBBC operates. Most purchasing is done within Cambodia, where staff hold a variety of positions, including those with specific project responsibilities. The policy requirements set out below must be applied as appropriate, allowing for these differences in responsibilities. In the Managing Director's absence, reference must be made to the Senior Leadership Team members or to the Finance Manager should further clarification be required.

4.2 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 SBBC's Authorisation Matrix. SBBC applies different limits for budgeted and unbudgeted expenditure.

4.3 Quotations Requirement

Individual Non Recurring Purchases less than \$US 300 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 and less than \$US 1,000 per item, will require at least two written (preferred) or documented verbal quotes.

Individual Purchases of \$US 1,000 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**.

4.4 Program Purchases

Program Managers are required to submit funding requests to the Managing Director 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 Finance Manager for review and to the Managing Director for approval.

The monthly Funding Request is consolidated by the Finance Officer, reviewed by the Finance Manager, and then submitted to the Managing Director for final approval.

4.5 Asset Purchases

All asset purchases must be approved prior to procurement; this is achieved through the completion of a 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 are as per the Authorisation Matrix.

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

4.6 Ethical Purchasing, Conflict of Interest, Confidentiality, and Counter Terrorism Sanctions

- Staff involved in procurement must comply in all respects with laws, ethics and SBBC's standards of professional conduct, which apply to their purchasing activities. In general, SBBC staff shall work to maintain and enhance high levels of accountability through ethical conduct and conscientious adherence to ethical methods of doing business.
- SBBC 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 favors from suppliers or contractors, such as fees, commissions, gifts, rewards or benefits or any form of bribes. All such decisions and actions are unacceptable and prohibited.
- SBBC 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.

- SBBC 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 SBBC staff member 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 the responsibility of all staff to ensure that adequate measures have been taken to assure that confidentiality is maintained.
- SBBC staff involved in the procurement process must understand the purpose of standard procurement procedures, as well as the policies that support these procedures, to provide a foundation for complete and consistent consideration of all aspects of the purchasing cycle.
- Suppliers of goods or services must be checked against the local country sanctions (i.e. Terrorism) checklist in accordance with SBBC's Counter Terrorism Policy and Cambodia's Counter Terrorism policy. *The Consolidated List* from DFAT (Australia) shall be used in addition to any local sanctions list. This list includes World Bank sanctioned entities and matches requirements in the EU and UK, in addition to Australia. Evidence of such checks must be maintained.
- There must be a segregation of duties so that staff purchasing goods and services are not also the approver of such purchases.

4.7 Contractors and Consultants

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

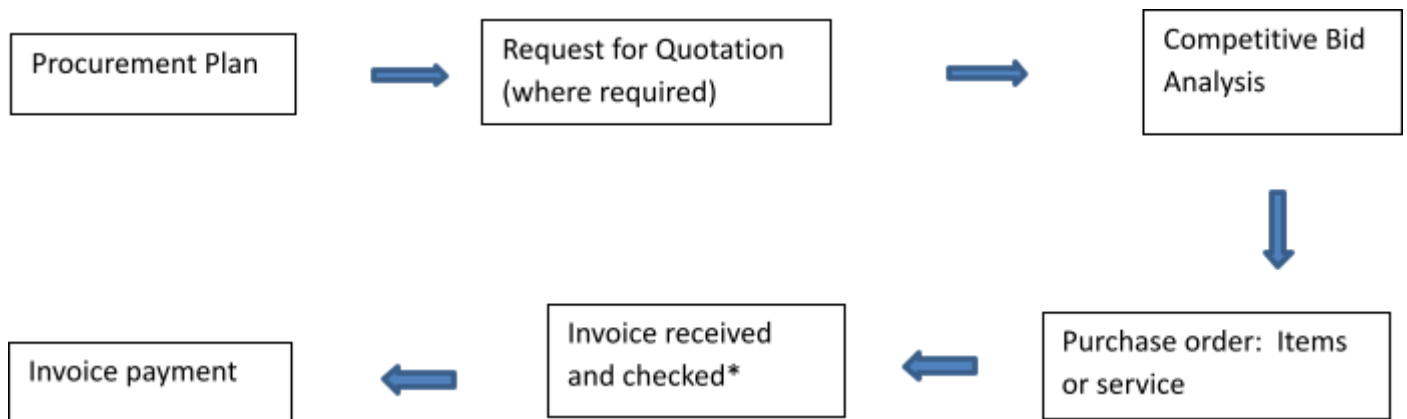
All engagements of contractors or consultants over \$US 300 in value will require **quotations as per 4.3 above**. A written agreement must be signed between the successful supplier and SBBC. In situations where the contracting supplier is planning to use a sub-contractor, this information must form 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.

4.8 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 SBBC receives value for money. Any such purchases shall be approved by the **Managing Director**, in writing.

4.9 Procurement Process



*Staff members must sign invoice as acknowledgement of receipt of goods/services, and to confirm acceptance of quality.

5 POLICY MANAGEMENT

All policy will include the following policy management statement and policy management table at the end of the document and the the approving minutes will be used as approval evidence:

This policy has been approved by the General Manager Shared Services and the Managing Director of SBBC as noted below.

Amendments will be recommended to the Managing Director from time to time as deemed appropriate by the General Manager Shared Services, usually annually. Formal reviews are recommended every three years from the anniversary date of approval by the Managing Director. Recommendations for minor changes can be approved by the General Manager Shared Services before the Managing Director review every three years.

This policy and any amendments have also been reviewed by the SBBC Board, as noted below.

Doc Ref	Doc Type	GM-Shared Services	Managing Director	Board Review	Minute Ref
PROP/05/2025/V1.0	Policy	12/05/2025- Email	08/05/2025 - Email	07/05/2025	Email trails 06- 08/5/2025

Appendix 1 – Procurement Limits

	Price (US\$)
Sanctions List check	Every supplier of goods and services regardless of price
No quotation required	<\$300
2 quotations required	\$300 to <\$1,000
3 written quotations required	\$1,000 and above