

REQUEST FOR TENDERS

RFT: 2026-011
File: SPREP 2/32
Date: 16 March, 2026
To: Interested consultants
From: Salome Tukuafu, Strategic Partnerships and Donor Relations Adviser

Subject: Request for tenders (RFT): Consultancy: Development of Anti-Money Laundering and Counter-Financing of Terrorism (AML/CFT); and Conflict of Interest Policies and Guidelines

1. Background

- 1.1. The Secretariat of the Pacific Regional Environment Programme (SPREP) is an intergovernmental organisation charged with promoting cooperation among Pacific islands countries and territories to protect and improve their environment and ensure sustainable development.
- 1.2. SPREP approaches the environmental challenges faced by the Pacific guided by four simple Values. These values guide all aspects of our work:
 - We value the Environment
 - We value our People
 - We value high quality and targeted Service Delivery
 - We value IntegrityFor more information, see: www.sprep.org.
- 1.3. The consultancy is funded by the Project Coordination Unit.

2. Specifications: statement of requirement

- 2.1. SPREP wishes to call for tenders from qualified and experienced consultants/consultancy firms for the development of Anti-Money Laundering and Counter-Financing of Terrorism, and Conflict of Interest Policies and Guidelines.
- 2.2. The Terms of Reference of the consultancy is set out in Annex A.
- 2.3. The successful individual must supply the services to the extent applicable, in compliance with SPREP's Values and Code of Conduct: https://www.sprep.org/attachments/Publications/Corporate_Documents/spreporganisational-values-code-of-conduct.pdf. Including SPREP's policy on Child Protection, Environmental Social Safeguards, Fraud Prevention & Whistleblower Protection and Gender and Social Inclusion.
- 2.4. SPREP Standard Contract Terms and Conditions are non-negotiable

3. Conditions: information for applicants

- 3.1. To be considered for this tender, interested consultants must meet the following conditions:
 - i. Submit a detailed Curriculum vitae detailing qualification and previous relevant experience for each proposed personnel;

- ii. Provide three referees relevant to this tender submission, including the most recent work completed;
 - iii. Complete the **tender application form** provided (*Please note you are required to complete in full all areas requested in the Form, particularly the Statements to demonstrate you meet the selection criteria – DO NOT refer us to your CV. Failure to do this will mean your application will **not** be considered*).
Provide examples of past related work outputs
For the Technical and Financial proposals you may attach these separately.
 - iv. Provide a copy of valid business registration/license.
- 3.2 Tenderers must declare any areas that may constitute conflict of interest related to this tender and sign the **conflict of interest form** provided.
- 3.3 **Tenderer is deemed ineligible due to association with exclusion criteria, including** bankruptcy, insolvency or winding up procedures, breach of obligations relating to the payment of taxes or social security contributions, fraudulent or negligent practice, violation of intellectual property rights, under a judgment by the court, grave professional misconduct including misrepresentation, corruption, participation in a criminal organisation, money laundering or terrorist financing, child labour and other trafficking in human beings, deficiency in capability in complying main obligations, creating a shell company, and being a shell company.
- 3.4 Tenderer must sign a declaration of **honour form** together with their application, certifying that they do not fall **into** any of the exclusion situations cited in 3.3 above and where applicable, that they have taken adequate measures to remedy the situation.

4. Submission guidelines

- 4.1. Tender documentation should demonstrate that the interested consultant satisfies the conditions stated above and in the Terms of Reference and is capable of meeting the specifications and timeframes. Documentation must also include supporting examples to address the evaluation criteria.
- 4.2. Tender documentation should be submitted in English and outline the interested individual's complete proposal:
- a) **SPREP Tender Application form and conflict of interest form.** (*Please note you are required to complete in full all areas requested in the Form, particularly the Statements to demonstrate you meet the selection criteria – DO NOT refer us to your CV. Failure to do this will mean your application will **not** be considered*).
Provide examples of past related work outputs
For the Technical and Financial proposals you may attach these separately.
 - b) **Honour form**
 - c) **Curriculum Vitae** of the proposed personnel to demonstrate that they have the requisite skills and experience to carry out this contract successfully.
 - d) **Technical Proposal** which contains the details to achieve the tasks outlined in the Terms of Reference.
 - e) **Financial Proposal** – provide a detailed outline of the costs involved in successfully delivering this project submitted in United States Dollars (USD) and inclusive of all associated taxes.

- 4.3. Provide three referees relevant to this tender submission, including the most recent work completed.
- 4.4. Tenderers/bidders shall bear all costs associated with preparing and submitting a proposal, including cost relating to contract award; SPREP will, in no case, be responsible or liable for those costs, regardless of the conduct or outcome of the bidding process.
- 4.5. The tenderer/bidder might be requested to provide additional information relating to their submitted proposal, if the Tender Evaluation Committee requests further information for the purposes of tender evaluation. SPREP may shortlist one or more Tenderers and seek further information from them.
- 4.6. The submitted tender proposal must be for the entirety of the Terms of Reference and not divided into portions which a potential tenderer/bidder can provide services for.
- 4.7. The Proposal must remain valid for 90 days from date of submission.
- 4.8. Tenderers must insist on an acknowledgement of receipt of tender.

5. Tender Clarification

- 5.1. a. Any clarification questions from applicants must be submitted by email to procurement@sprep.org before 30 March 2026. A summary of all questions received complete with an associated response posted on the SPREP website www.sprep.org/tender by 01 April 2026.
- b. The only point of contact for all matters relating to the RFT and the RFT process is the SPREP Procurement Officer.
- c. SPREP will determine what, if any, response should be given to a Tenderer question. SPREP will circulate Tenderer questions and SPREP's response to those questions to all other Tenderers using the SPREP Tenders page (<https://www.sprep.org/tenders>) without disclosing the source of the questions or revealing any confidential information of a Tenderer.
- d. Tenderers should identify in their question what, if any, information in the question the Tenderer considers is confidential.
- e. If a Tenderer believes they have found a discrepancy, error, ambiguity, inconsistency or omission in this RFT or any other information given or made available by SPREP, the Tenderer should promptly notify the Procurement Officer setting out the error in sufficient detail so that SPREP may take the corrective action, if any, it considers appropriate.

6. Evaluation criteria

- 6.1. SPREP will select a preferred consultant on the basis of SPREP's evaluation of the extent to which the documentation demonstrates that the tenderer offers the best value for money, and that the tender satisfies the following criteria:
- 6.2. A proposal will be rejected if it fails to achieve 70% or more in the technical criteria and its accompanying financial proposal shall not be evaluated.

I. Technical Score – 80%

Criteria	Detail	Weighting
Qualifications Experience	Qualifications of the team – refer TOR Section 5.0	15
	Demonstrated years of experience of the team in: <ul style="list-style-type: none"> institutional governance and policy development, AML/CFT compliance and risk management. ethics and conflict of interest frameworks. 	15
Experience	<ul style="list-style-type: none"> Demonstrated experience developing integrity, fiduciary, and compliance frameworks for international, regional or multilateral organisations. Strong drafting, analytical, and stakeholder facilitation skills. Familiarity with risk-based approaches and international AML/CFT standards Experience harmonising policies within complex institutional environments. Experience advising public sector or multilateral institutions preferred. 	30
Technical Proposal / Methodology	Proposed methodology and workplan to undertake the tasks outlined in these terms of reference, acknowledging the timelines to complete the deliverables.	20

II. Financial Score – 20%

The following formula shall be used to calculate the financial score for ONLY the proposals which score 70% or more in the technical criteria:

$$\text{Financial Score} = a \times \frac{b}{c}$$

Where:

a = maximum number of points allocated for the Financial Score

b = Lowest bid amount

c = Total bidding amount of the proposal

7. Variation or Termination of the Request for Tender

- 7.1 a. SPREP may amend, suspend or terminate the RFT process at any time.
- b. In the event that SPREP amends the RFT or the conditions of tender, it will inform potential Tenderers using the SPREP Tenders page (<https://www.sprep.org/tenders>).
- c. Tenderers are responsible to regularly check the SPREP website Tenders page for any updates and downloading the relevant RFT documentation and addendum for the RFT if it is interested in providing a Tender Response.
- d. If SPREP determines that none of the Tenders submitted represents value for money, that it is otherwise in the public interest or SPREP's interest to do so, SPREP may terminate this RFT

process at any time. In such cases SPREP will cancel the tender, issue a cancellation notice and inform unsuccessful bidders accordingly.

8. Deadline

- 8.1. **The due date for submission of the tender is: 07 April 2026, midnight (Apia, Samoa local time).**
- 8.2. Late submissions will be returned unopened to the sender.
- 8.3 Please send all tenders clearly marked 'RFT 2026-011: Consultancy: Development of Anti-Money Laundering and Counter-Financing of Terrorism; and Conflict of Interest Policies and Guidelines - SPREP

Mail: SPREP
Attention: Procurement Officer
PO Box 240
Apia, SAMOA
Email: tenders@sprep.org (MOST PREFERRED OPTION)
Fax: 685 20231
Person: Submit by hand in the tenders' box at SPREP reception,
Vailima, Samoa.

Note: Submissions made to the incorrect portal will not be considered by SPREP. If SPREP is made aware of the error in submission prior to the deadline, the applicant will be advised to resubmit their application to the correct portal. However, if SPREP is not made aware of the error in submission until after the deadline, then the application is considered late and will be returned unopened to the sender.

SPREP reserves the right to reject any or all tenders and the lowest or any tender will not necessarily be accepted.

SPREP reserves the right to enter into negotiation with respect to one or more proposals prior to the award of a contract, split an award/awards and to consider localised award/awards between any proposers in any combination, as it may deem appropriate without prior written acceptance of the proposers.

A binding contract is in effect, once signed by both SPREP and the successful tenderer. Any contractual discussion/work carried out/goods supplied prior to a contract being signed does not constitute a binding contract.

For any complaints regarding the Secretariat's tenders please refer to the Complaints section on the SPREP website
<http://www.sprep.org/accountability/complaints>

Annex A – Terms of Reference

Consultancy: Development of Anti-Money Laundering (AML) and Counter-Financing of Terrorism (CFT); and Conflict of Interest Policies and Guidelines - SPREP

1.0 INTRODUCTION

The Secretariat of the Pacific Regional Environment Programme (SPREP) is strengthening its governance, fiduciary, and integrity frameworks to align with international best practice and partner requirements.

SPREP seeks to develop:

- 1. An Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Policy and Guidelines**
- 2. A Conflict of Interest (COI) Policy and Guidelines**

These policies must be aligned with SPREP's broader governance framework and existing institutional instruments, including but not limited to:

- SPREP Financial Regulations
- SPREP Financial Procedures
- SPREP Procurement Policy and Procedures Manual
- Fraud Prevention and Whistleblower Protection Policy
- Environmental and Social Management System (ESMS) (under development)
- Grievance Redress Mechanism (GRM) (under development)
- Grant Policy and Procedures
- Risk Management Policy
- Governance Policy

To ensure coherence and efficiency, SPREP intends to engage a team of consultants led by a senior governance/policy expert, supported by targeted technical expertise in AML/CFT and Conflict of Interest frameworks.

2.0 OBJECTIVES OF THE CONSULTANCY

The objective of this assignment is to develop comprehensive, practical, and internationally aligned:

- AML/CFT Policy and Implementation Guidelines; and
- Conflict of Interest Policy and Implementation Guidelines
- that are fully harmonised with SPREP's broader policy and control framework.

3.0 SCOPE OF WORK

The consultancy team will undertake the following:

3.1 Institutional and Framework Review

(i) Review SPREP's broader governance and policy architecture, and SPREP's operating environment including its ecosystem for payments and transfers, business model and partnership framework to determine context for application of these policies.

(ii) Analyse existing instruments to ensure alignment and avoid duplication, including:

- Financial Regulations
- Financial Procedures
- Procurement Policy and Procedures

- Fraud Prevention
- Whistleblower Protection Policy
- ESMS and GRM (in development)
- Grant Policy and Procedures
- Risk Management Policy
- Governance Policy

(iii) Identify gaps, overlaps, and integration points.

(iv) Benchmark against relevant international standards, best practices and development partner/donor requirements.

(v) Develop a policy alignment matrix demonstrating coherence and cross-referencing

3.2 Development of AML/CFT Policy and Guidelines

The team will:

1. Conduct a risk-based assessment of AML/CFT exposure relevant to SPREP's operations, funding flows, partnerships, and geographic context.
2. Develop an AML/CFT Policy that includes:
 - Risk assessment framework
 - Due diligence requirements (including Know Your Customer where relevant)
 - Screening and monitoring mechanisms
 - Reporting obligations and escalation procedures
 - Record-keeping requirements
 - Roles and responsibilities
 - Sanctions and disciplinary measures
 - Develop practical implementation guidelines, templates, forms and tools.

The AML/CFT specialist will provide technical input and validation, while the Lead Policy Consultant ensures institutional integration and consistency.

3.3 Development of Conflict of Interest Policy and Guidelines

The team will:

- (i) Assess current conflict of interest management practices, existing forms and gaps.
- (ii) Develop a Conflict of Interest Policy covering:
 - Definitions and scope (actual, potential, perceived conflicts)
 - Disclosure requirements
 - Management and mitigation measures
 - Decision-making protocols
 - Register of interests
 - Oversight and enforcement
- (iii) Develop practical implementation tools:
 - Disclosure and declaration forms

- Review and determination procedures
- Guidance notes for staff and management
- Decision making flowcharts

The Conflict of Interest specialist will provide subject-matter expertise and technical input/validation, while the Lead Policy Consultant ensures consistency with SPREP governance systems.

3.4 Consultation and Validation

- Facilitate stakeholder consultations with relevant SPREP staff (management, Finance, Procurement, Legal, HR, programme staff as appropriate).
- Present draft policies for feedback.
- Incorporate comments and finalise documents.
- Provide a briefing session to management and relevant staff on implementation considerations

3.5 Institutional Capacity and Implementation Readiness Assessment

In addition to policy development, the consultancy team shall assess SPREP's institutional capacity to implement the proposed frameworks.

This shall include:

- Identification of required capabilities to operationalise the policies, including:
 - Governance and oversight structures
 - Defined compliance roles and responsibilities
 - Technical expertise and staffing requirements
 - Systems and tools (e.g., registers, screening systems, reporting mechanisms)
 - Training and awareness needs
 - Monitoring, review, and internal control mechanisms
- Gap analysis comparing existing capacity with required capabilities.
- Practical, phased recommendations for implementation, including:
 - Immediate actions (0–6 months)
 - Medium-term strengthening measures
 - Indicative resource implications (staffing, systems, budget considerations)

4.0 DELIVERABLES

The consultancy team shall produce:

- Inception Report, including:
 - Methodology and workplan
 - Document review summary
 - Policy integration framework
- Policy Alignment Matrix, cross-referencing proposed policies with existing SPREP instruments.

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A resilient Pacific environment sustaining our livelihoods and natural heritage in harmony with our cultures.

3. Draft AML/CFT Policy and Implementation Guidelines
4. Draft Conflict of Interest Policy and Implementation Guidelines
5. Institutional Capacity and Implementation Readiness Report, including:
 - Required capability framework
 - Gap analysis
 - Phased implementation roadmap
 - Indicative resource implications
6. Final AML/CFT Policy and Implementation Guidelines
7. Final Conflict of Interest Policy and Implementation Guidelines
8. Implementation Toolkit, including templates, registers, disclosure forms, and process flowcharts.
9. Management Presentation and Briefing Materials

5.0 TEAM COMPOSITION AND REQUIRED QUALIFICATIONS

A. Lead Policy and Governance Consultant (Team Lead)

Qualifications and Experience:

- Advanced degree in law (or higher), governance, public policy, finance, or related field.
- Minimum 10–15 years' experience in institutional governance and policy development.
- Demonstrated experience developing integrity, fiduciary, and compliance frameworks for international, regional, or multilateral organisations.
- Experience harmonising policies within complex institutional environments.
- Strong drafting, analytical, and stakeholder facilitation skills.

Responsibilities:

- Overall coordination and delivery of the assignment.
- Lead institutional review and integration analysis.
- Draft core policy documents.
- Ensure coherence across AML/CFT and COI frameworks.
- Integrate technical inputs from specialists.

B. AML/CFT Specialist (Short-Term Technical Input)

Qualifications and Experience:

- Advanced degree in finance, law, compliance, or related discipline.
- Minimum 7–10 years' experience in AML/CFT compliance and risk management.
- Experience advising public sector or multilateral institutions preferred.

- Familiarity with risk-based approaches and international AML/CFT standards.

Role:

- Provide targeted technical expertise.
- Review and validate AML/CFT policy components.
- Advise on risk assessment and screening frameworks.

C. Conflict of Interest Specialist (Short-Term Technical Input)

Qualifications and Experience:

- Advanced degree in law, governance, ethics, or public administration.
- Minimum 7–10 years' experience in ethics and conflict of interest frameworks.
- Experience in international or public sector institutions preferred.

Role:

- Provide subject-matter expertise on COI standards.
- Review and validate policy content.
- Support development of disclosure and management tools.

6.0 DURATION AND LEVEL OF EFFORT

Indicative total level of effort: 45 working days, allocated approximately as:

- Lead Consultant: 25 days
- AML/CFT Specialist: 10 days
- Conflict of Interest Specialist: 10 days

Final allocation to be confirmed in the Inception Report.

7.0 REPORTING AND SUPERVISION

The consultancy team will report to the Strategic Partnerships and Donor Relations Adviser; with technical oversight from SPREP's Finance and Legal teams. The Lead Consultant will serve as the primary focal point and be responsible for coordination of all team members and timely delivery of outputs.