



(ORGANISATION):

Anti-Corruption Policy

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Introduction

This document presents the policy outlining ORGANISATION's commitment to implementing an organization wide approach to counter corruption, which will address and represent our anti-bribery efforts. The policy includes values, code of conduct, and overall policy on the subject. Furthermore, the document introduces procedures, risk management, internal and external communication, training and guidance, internal controls, oversight, monitoring and assurance.

Objective

It is the objective of the policy to contribute positively to the promotion of good governance and transparency thorough the activities and projects of ORGANISATION and to adhere to EU, National and International, standards on anti-corruption.

ORGANISATION will under no circumstances accept or condone bribery, extortion, fraud or other kinds of corruption in connection with our activities at home or abroad – ORGANISATION has a zero tolerance policy.

Definition of corruption

Corruption is defined by Transparency International, the leading international NGO in the fight against corruption, as "the abuse of entrusted power for personal gain."

Corruption can also be differentiated in terms of what can be called 'true corrupt intent' and 'necessary corruption', which occurs in order to get things done. Corruption in terms of true corrupt intent implies bribery in order to obtain a service to which one is not legally entitled. In contrast, necessary corruption implies bribery in order to obtain a service to which one is legally entitled. Facilitation payments would fall under this latter category of corruption.

The main forms of corruption are bribery, embezzlement, fraud and extortion.

Corruption is traditionally defined as a practice involving a public official abusing her/his position. However, corrupt practices can also occur within the private sector when a private sector employee abuses her/his position in the private



entity for personal gain. Private (also called commercial) bribery is only addressed by a limited number of international conventions.¹

In this line of work, corruption will often present itself as:

- Conflicts of interest
- Bribes
- Political contributions
- Charitable contributions and sponsorships
- Facilitation payments
- Gifts, hospitality and expenses ²

How to react towards and counter corruption

A. At organizational level within ORGANISATION

Training

a.1 Directors, managers, volunteers and partners will receive appropriate training/information on the organizations anti-corruption policy.

a.2 Where appropriate contractors and suppliers should receive training on the anti-corruption policy.

Raising concerns and seeking guidance

a.3 To be effective, the anti-corruption policy should rely on employees and others to raise concerns and violations as early as possible. To this end, we will provide secure and accessible channels through which employees and others should feel able to raise concerns and report violations (“whistleblowing”) in confidence and without risk of reprisal.

a.4 These or other channels should be available for employees to seek advice on the application of the anti-corruption policy.

Internal controls and record keeping

a.7 ORGANISATION will establish and maintain an effective system of internal controls to counter bribery, comprising financial and organizational checks and balances over the enterprise’s accounting and record keeping practices.

¹ <http://www.business-anti-corruption.com/about/what-is-corruption.aspx>

² For further clarification see “*Business Principles for Countering Briber*” 2009



a.8 ORGANISATION will maintain available for inspection, accurate book keeping and records that properly and fairly document all financial transactions. ORGANISATION will not maintain off-the-books accounts.

a.9 ORGANISATION will subject the internal control systems, in particular the accounting and record keeping practices, to regular review and audit to provide assurance on their design, implementation and effectiveness.

Monitoring and review

a.10 ORGANISATION will establish feedback mechanisms and other internal processes supporting the continuous improvement of the anti-corruption policy. The Board of Directors and the management of ORGANISATION will monitor the anti-corruption policy and periodically review the policy's suitability, adequacy and effectiveness and implement improvements as appropriate.

a.11 The ORGANISATION Steering Committee will periodically report the results of the anti-corruption policy to the Board or equivalent body.

a.12 ORGANISATION's Board or equivalent body should make an independent assessment of the adequacy of the anti-corruption policy in the Annual Report as part of its Annual Financial Statement.

B. At Project level in the South and with international partnerships

Partners, agents and other intermediaries:

b.1 Where ORGANISATION is unable to ensure that a partner or agent has an anti-corruption approach consistent with its own, it will conduct an initial risk assessment and initiate appropriate action if bribery occurs or is reasonably thought to have occurred. This can include requiring correction of deficiencies in the implementation of the partner project or consortium's project, the application of sanctions or exiting from the arrangement.

b.2 ORGANISATION are not to channel improper payments through partners, agents or other intermediaries.

b.3 ORGANISATION is to undertake properly documented due diligence before appointing partners, agents or other intermediaries.

b.4 All agreements with partners, agents or other intermediaries should require prior approval of management.

b.5 Compensation paid to partners, agents or other intermediaries should be appropriate and justifiable remuneration for legitimate services rendered.

b.6 Partners, agents and other intermediaries should agree contractually to



comply with ORGANISATION's policy on anti-corruption and be provided with appropriate advice and documentation explaining their obligation (the policy is to form part of the Appendix of all relevant agreements).

b.7 ORGANISATION contractually requires its partners, agents and other intermediaries to keep proper accounts and records available for inspection by the enterprise, auditors or investigating authorities.

Contractors and suppliers

b.8 ORGANISATION and its partners are to conduct procurement practices in a fair and transparent manner.

b.9 ORGANISATION is to take steps to identify the contractors and suppliers used by its partners.

b.10 ORGANISATION is to assess the risk of bribery in its contractors and suppliers and conduct regular monitoring.

b.11 ORGANISATION is to communicate its anti-corruption policy to contractors and suppliers and work in partnership with major contractors and suppliers to help them develop their anti-bribery practices.

b.12 As ORGANISATION and its donors (Danish Government funds and private donors / sponsorships) commit themselves to the international standards of anti-corruption, the following clause must, as policy standard, form part of all contracts entered into by ORGANISATION or its partner in the framework of a project partnership.

No offer, payment, consideration or benefit of any kind, which could be regarded as an illegal or corrupt practice, shall be made - neither directly nor indirectly - as an inducement or reward in relation to tendering, award of the contract, or execution of the contract. Any such practice will be grounds for the immediate cancellation of this contract and for such additional action, civil and/or criminal, as may be appropriate.



International standards to adhere to:

Transparency International	http://transparency.org/
United Nations Global Compact	http://www.unglobalcompact.org
United Nations Convention against Corruption	http://www.unodc.org/pdf/crime/corruption/UN_Guide.pdf