



Anti-corruption policy

1. Introduction

The anti-corruption policy is developed based on the Christian Democratic International Center (KIC) approach on corruption and fraud. The purpose of the policy is to increase the organization's awareness of corruption and ability to prevent and manage the occurrence of corruption and fraud in an efficient manner. KIC wants to counter corruption and fraud both in its own operations and contribute to combating corruption and fraud in the countries where KIC is working.

2. KIC's policy against corruption

KIC shares the view that corruption and fraud is a serious obstacle to development. Corruption demoralises political systems, democracy and undermines the respect for human rights. Furthermore corruption undermines the rule of law and affects particularly the poor. Corruption results in the inefficient allocation of resources, contributes to environmental degradation and destroys predictability and hope for the future. There is also a threat to KIC's assets and reputation.

KIC is convinced that the best way to avoid corruption is to have preventive measures that reduce the likelihood of any situation of corruptive behaviour.

KIC has zero-tolerance on corruption, both in its own organisation and in partner organisations or operations of any kind funded by KIC.

The employees at the KIC and their committee are comprised by the policy. Every employee at KIC has a personal responsibility to prevent corruption and fraud, and to act on suspicion.

KIC will work to combat corruption in the programmes. KIC's anticorruption policy applies to KIC and to partner organisations that drive development cooperation with support from KIC.

KIC should expressly prohibit its staff, volunteers, partners organizations and their staff and volunteers as well as consultants in projects / programmes financed by KIC that, for themselves or another, receive or be promised, ask or leave, promise or offer a bribe or other improper reward, compensation, improper gain or benefit of any kind that may constitute illegal or improper behaviour.

- **Always prevent**
- **Never accept**
- **Always inform**
- **Always act**¹

¹ Sida's anti corruptions policy 2011

3. Definition

KIC's definition of **corruption** is the "use of privileges by officers or functional equivalent positions for personal/organisational benefit". However corruption can be and is defined more broadly for development cooperation as "the behaviour of persons or organisations entrusted with public or private responsibilities that abuse their duties to achieve unjustified benefits". This means that the term covers not only the public sphere but also the private and semi-public sphere, ethical standards in civil society, the practices of exploiting positions of trust held by private individuals in business and also political corruption.

Corruption can appear everywhere and it is known that all organisations involved in development cooperation come across corruption at some point. Mistakes are not the same as corruption and anyone can make mistakes. The important part is to talk about corruption and acknowledge it as a problem.

Fraud is a type of criminal activity, defined as: 'abuse of position, or false representation, or prejudicing someone's rights for personal gain'. Put simply, fraud is an act of deception intended for personal gain or to cause a loss to another party.

The general criminal offence of fraud can include:

- Deception whereby someone knowingly makes false representation
- Or fail to disclose information
- Or abuse his/her position.

4. Examples of corruption is:

- **Favouritism/nepotism**
 - The unfair favouring of one person or group at the expense of others
 - Friendship Corruption
- **Bribery**
 - When someone improperly provides goods or services with the purpose of receiving compensation later on
- **Theft or misuse**
 - Of money
 - Of power and / or position
 - To-use-entrusted power of staff
 - Benefits or gain, e.g. money, services, sexual favours in exchange for other services
 - Of the organization's assets
 - Of protected information
- **Diversion of resources**
 - For private gain – fraud, embezzlement etc.
 - Giving the contract to a third party for personal gain
- **False information**
 - False bookkeeping
 - False reporting

5. How KIC will prevent corruption and fraud

KIC will actively work to prevent, deter and detect all forms of illegal or improper handling or other forms of misuse of funds. KIC should immediately inform the donor of any such holding of funds in any activity under the agreement of which KIC has become aware, promptly set out to take appropriate measures, keep a close contact with the donor, and send a final report to the donor on the case when it ended. All employees at KIC should complete Sida's anti-corruption course.

It is important that the project manager talk about corruption with all partners. It is important to try to develop the same view on the effects of corruption. In connection with the negotiation and contract signing KIC's approach to corruption is particularly important. It is also important to mention the effect that the detection of corruption will have on the project such as claims for reimbursement of funds and termination of contracts. KIC should highlight the importance of transparency to build confidence of partners in the country of operation and highlight the positive effects of active work on anti-corruption for a political organization.

6. Handling of suspicions of corruption and / or fraud

KIC has zero-tolerance of corruption, both in its own organisation and within partner organisations or operations of any kind funded by KIC. KIC investigates all indications of corruption or corrupt behaviour. KIC, board, staff, partner organisations and operations funded by KIC are not allowed to provide for, request or receive anything that can be defined as corruption. Both KIC and its partners should adopt anti corruption routines.

KIC staff, volunteers and partners should always inform the Secretary General of suspected corruption or other disagreement, whether they occur in the field or in Sweden. The Secretary General should immediately start an investigation of the incident. The investigation must be documented in a separate document setting where all events, decisions, actions and correspondence related to the incident are noted with the date and a description.

The Secretary General will contact and inform the donor, the Secretary General and the programme manager talk with the involved, alternatively, the Secretary General and/or the Chairperson are responsible for the investigation of suspected corruption in KIC.

If there, for some reason, it is not possible to contact the Secretary General, one can anonymously report corruption and fraud through KIC's "Whistle-blower system"

7. KIC's whistle-blower system

KIC's "whistle-blower system" makes it possibility for a KIC employee, volunteer or partner to make an anonymous report of suspected corruption or fraud. The whistle-blower system intends to protect the complainant's identity, as far as possible.

Report system

The reporting of suspected corruption through the whistle-blower system can be done in writing or by telephone to phone number +46 (0)70 377 27 36 (KIC chairperson).

Protection of a person using the "whistle-blower system"

Anonymous and/or confidential report through the whistle-blower system means a protection to the risk of being subjected to harassment, intimidation, and discrimination on the grounds that

he / she made such a report. If an employee who reported corruption or fraud may feels that he or she is being or has been, harassed, threatened or discriminated against by another employee are encouraged he / she should immediately notify the Secretary General or the Chairperson or any other member in the Board. Such notification will be investigated immediately.

8. Responsibility

KICs board

- Takes decision about the anti-corruption policy
- Reports corruption and fraud (of larger and more serious matter) to the donor
- Has responsibility for the internal control system.

KIC Secretary General

Has a special responsibility for protecting KIC from corruption and fraud. He/she should:

- Provide guidance on the steps to be taken by KIC 's staff to implement the corruption policy
- Ensure that reports of suspected or actual corruption and fraud are investigated immediately and adequately in collaboration with relevant programme managers
- Ensure that any investigation of corruption and fraud is followed by a review of KIC's internal control systems and that recommendations are developed for how the system can be improved
- Ensure that appropriate legal and / or disciplinary actions are taken against those who have attempted to commit or have committed corruption or fraud.
- Report corruption and fraud to KIC's board

KIC staff

- All KIC managers are responsible, within their respective areas to promote an environment and activities free from corruption and fraud. Managers must ensure that:
- The anti-corruption policy is communicated to all partners and volunteers involved in the programme
- All KIC employee have read, approved and signed a copy of the anti-corruption policy
- All employees have had the training and understand what is in the anti-corruption policy
- All employees are aware of what KIC's zero tolerance for corruption and fraud means and accept this principle
- All employees follow KIC's anti-corruption policy
- All employees know how and to whom to turn if they have suspicions of corruption or fraud
- Report all suspicions of corruption and fraud in accordance with KIC's routines
- Assess the types of risks for corruption and fraud contained in the activities for which they are responsible
- Ensure that there are adequate systems of internal control within their programme and that these systems are working effectively and complied with
- KIC staff are alert to the warning signs of corruption and fraud

KIC partners

- All KIC partners are responsible, within their respective areas to promote an environment and activities free from corruption and fraud.

Partners must ensure that:

- The anti-corruption policy is communicated to all staff and volunteers involved
- All KIC partners have read, approved and signed a copy of the anti-corruption policy (most common it is attached to the agreement)
- All partners have had the training and understand what is in the anti-corruption policy
- All partners are aware of what KIC's zero tolerance for corruption and fraud means and accept this principle
- All partners follow KIC's anti-corruption policy
- All partners know how and to whom to turn if they have suspicions of corruption or fraud
- Report all suspicions of corruption and fraud in accordance to KIC's routines

KIC Volunteers

- The anti-corruption policy is communicated to all volunteers
- All KIC volunteers have read, approved and signed a copy of the anti-corruption policy
- All volunteers are aware of what KIC's zero tolerance for corruption and fraud means and accept this principle
- All volunteers follow KIC's anti-corruption policy
- All volunteers know how and to whom to turn if they have suspicions of corruption or fraud
- Report all suspicions of corruption and fraud in accordance to KIC's routines

Assurance / Anti-korruptions försäkran

I certify that I have read and fully understood the meaning of KIC's anti-corruption policy. I accept the contents and agree to work in accordance with it.

Name:

Date:

Signature:

I certify that I have communicated KIC's anti-corruption policy from date
.....

Secretary General

Date:

Signature: