



# HRHF Anti-Corruption Policy

Adopted 18 February 2019

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## Zero tolerance for corruption

This policy document describes how HRHF works to prevent corruption or financial irregularities. This policy does not prevent HRHF staff or partners from reporting corruption or financial irregularities to the police or another public authority with powers to handle the case.

Human Rights House Foundation (HRHF) takes a zero-tolerance approach to corruption and other financial irregularities. HRHF does not tolerate corruption in relation to any of our work and the work of organisations in Human Rights Houses (HRHs), and requires that all suspicions of corruption thought to be in breach of this policy are reported to HRHF.

HRHF takes suspicions of corruption seriously, and will assess, act upon, investigate, and discipline all such cases as appropriate in a professional, transparent and fair manner. In cases where criminal offences are detected, HRHF will report them to the police.

Compliance with this policy is mandatory for staff, implementing partners, contractors and related third parties. Failure to comply will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with HRHF.

Civil proceedings to claim reimbursement and, if appropriate, compensation could be instituted if the partner concerned refuses to settle. The steps to be taken will be considered on a case-to-case basis, depending on the type of non-compliance, the amount involved, the wording of the agreement and the likelihood of recovering the funds.

## Upholding HRHF's values and principles

At HRHF, we believe in conducting our work ethically and honestly. We adhere to the values and principles set forth in the Code of Conduct for HRHF and organisations in HRHs (hereafter Code of Conduct), and we are in full compliance with all laws and regulations applicable to the respective contexts in which we work. Our work is grounded on the principles of transparency and accountability, respect and equality, impartiality, and independence.

HRHF works with "entrusted means" – funds and other resources entrusted to the organisation by public donors for efficient, accountable, and transparent use in our international operations. We have an obligation to these donors to ensure that these funds and resources and our activities are not subject to corruption.

In many of the environments in which HRHF operates, corruption is extensive, institutionalised and systemic. Any direct or indirect involvement in corruption poses a serious threat to the integrity and credibility of HRHF and organisations in HRHs, endangering our ability to maintain our values and to work according to our principles.

Preventing corruption in our work is a priority for HRHF and a requirement for all staff, implementing partners, contractors and related third parties. Through this Anti-Corruption Policy and our strict zero-tolerance approach to corruption, HRHF aims to eliminate corruption from our work, advise partners on how to avoid corruption, and actively support the international fight against corruption.

## **Corruption definition, financial irregularities and conflict of interest**

HRHF defines corruption as any form of fraud or serious misconduct in accordance with our Code of Conduct. This definition is not limited to interactions with public officials and covers both active and passive corruption, as well as monetary and non-monetary corruption. This definition includes, but is not limited to, forms of corruption such as: facilitation payments, bribery, gifts constituting an undue influence, kickbacks, favouritism, cronyism, nepotism, extortion, embezzlement, misuse of confidential information, theft, and various forms of procurement fraud.

“Financial irregularities” refers to all kinds of:

- misappropriation of cash, inventory and all other kinds of assets
- financial and non-financial fraudulent statements
- all other use of entrusted means which is not in accordance with the respective implementation plan, budget and contract terms.

Conflicts of interest arise from situations in which a person has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of their functions and/or decision making.

## **Anti-corruption culture and practices**

HRHF is committed to ensuring that everyone subject to this Anti-Corruption Policy understands the following:

- The consequences of violating the policy as it applies to them
- Their duty to report all suspicions of corruption and/or financial irregularities thought to be in breach of this policy and Code of Conduct to HRHF
- How to report suspicions via HRHF’s Reporting Mechanisms for internal and external whistle blowers.

All staff members, implementing partners, and beneficiaries are obliged to familiarise themselves with our Code of Conduct and principles of work and have a duty to report evidence or suspicions of a breach of the Code of Conduct.

HRHF ensures that external stakeholders – implementing partners, contractors, other third parties and beneficiaries – understand the standards and behaviour required of HRHF staff. HRHF also ensures that these external stakeholders comply with this Anti-Corruption Policy and Code of Conduct, in terms of the standards and behaviour required. Failure to comply will result in termination of the violating party’s contract/grant agreement/or business relationship with HRHF.

Staff members are committed to staying accountable and transparent, upholding HRHF’s values and integrity, following internal formal procedures and policies, and safeguarding HRHF’s entrusted means. Staff members are prohibited from engaging in corrupt activities that would compromise HRHF’s image and integrity, both in their work and in their private life. Failure to comply will result in disciplinary action up to, including the possibility of termination of employment. Every employee

has an obligation to raise any related issues, questions, doubts, or concerns to HRHF management, according to the Employee Handbook.

HRHF is committed to using transparent, straightforward and clear procedures, an internal control system, and documentation in order to avoid corruption in our work and the work of organisations in HRHs.

Internally, HRHF ensures that all staff are familiar with:

- Code of Conduct for HRHF and organisations in HRHs
- Employee Handbook
- Anti-Corruption Policy
- Risk management system
- Procurement rules

HRHF is committed to avoiding conflicts of interest – real or potential – between personal interests and the interests of HRHF. This includes ensuring that any representation or hospitality promised, given, or received is modest, occurs within a standard business framework, and aligns with donor regulations. Staff members are prohibited from promising, offering, giving, seeking or accepting personal gifts or other advantages representing more than token value to or from persons of concern, donors, implementing partners, suppliers, authorities or other third parties. All cash gifts are strictly prohibited. Staff involved in the procurement process will exert enhanced caution in this regard.

When faced with a potential or actual conflict of interest, staff are required to promptly inform HRHF's management. HRHF will, without delay, take all necessary measures to resolve the conflict. If the conflict of interest cannot be resolved and/or it relates to a decision or transaction of special significance to a Project, the decision or transaction may not be concluded without the prior written approval of the Donor(s) of the Project.

HRHF is committed to promoting awareness and use of its complaints and reporting mechanisms and to ensuring that all subjects of the policy, including people of concern, staff, implementing partners, contractors, and related third parties, have safe, easy, and trusted access to report suspected corruption in confidence. All reported suspicions of corruption will be taken seriously and investigated as appropriate in accordance with professional, transparent and fair procedures. HRHF is committed to protecting reporting persons' confidentiality and rights and does not tolerate retaliation against reporting persons.

HRHF is committed to meeting its obligations to report instances of corruption and/or financial irregularities to relevant donors and to external authorities as appropriate.

HRHF will seek to recover any assets lost due to corruption.

## **Compliance and corruption risk management**

HRHF's corruption risk-management approach is based on high standards of personal and organisational integrity, accountability and transparency. The corruption risk management system is implemented through a number of instruments. These range from individual project documents and contracts that reflect on corruption risks and mitigation measures, to internal policies and operational manuals that provide details on HRHF's risk-management mechanisms.

HRHF is committed to knowing and understanding the anti-corruption laws and regulations applicable to its projects and the areas in which it operates. HRHF staff comply with the laws of the

countries in which they are located as well as the rules and regulations of HRHF's donors and applicable international anti-corruption legislation and conventions.

HRHF will learn from corruption cases, take corrective action, and adjust its mechanisms and practices accordingly in order to better prevent future cases and ensure compliance. HRHF management will review this Anti-Corruption Policy and related reporting procedures annually, with respect to legal and regulatory developments and to the actual project framework to ensure compliance and best practice. HRHF is committed to systematically assessing and reviewing corruption risks in its work and the work of HRHs.