

# ANTI-CORRUPTION POLICY

## Definition

Kvinna till Kvinna defines corruption as *“an abuse of trust, power or position that results in improper gain for a person, organisation, political party, company or other”*.

Corruption can take many forms, including, but not limited to, bribery, facilitation payments, gifts constituting an undue influence, kickback payments, favouritism and nepotism, extortion, sextortion, embezzlement, conflict of interest, theft and various forms of fraud, such as forgery or falsification of documents, financial fraud and procurement fraud.<sup>1</sup>

Our definition includes both attempted and actual corruption, financial and non-financial corruption, and any irregularities related to corruption.

## Introduction

At Kvinna till Kvinna, we believe in conducting our work ethically, honestly, transparently, with integrity and accountability, and in compliance with laws and regulations applicable to the contexts we work in. Our commitment to doing our work the right way is a crucial part of what makes us Kvinna till Kvinna.

In contrast, corruption poses a direct threat to our values, our ability to work according to a rights-based approach and our commitment to do no harm. It has profound adverse effects on social, economic and political development, disproportionately harms the poor and vulnerable (including women) and prevents us from properly and effectively conducting our work. Corruption contributes to the unequal allocation of resources and is often central to conflicts. Because of this, our anti-corruption work is in line with and contributes to conflict sensitivity in our operations.

Women are often disproportionately affected by corruption, as they tend to be overrepresented among those prevented from accessing and controlling resources (such as power) in society. This makes it particularly important for Kvinna till Kvinna to work against corruption, as it is a symptom and enabler of exclusionary, patriarchal power structures. Any direct or indirect involvement in corruption poses a serious threat to our integrity and credibility as an organisation, and could severely harm the women whose rights we promote. Preventing corruption in our operations is therefore not just a priority but a necessity dictated by our mandate, as well as a requirement for all staff, partner organisations, consultants, contractors and related third parties.

Kvinna till Kvinna works with funds that public and private donors trust us to use properly, efficiently and effectively. We have an obligation towards our donors to ensure neither these funds nor our activities are subject to corruption. Effective prevention, detection and response mechanisms for corruption are essential in protecting our interests against financial loss and reputational risk; delivering programmes and projects effectively; establishing trusted partnerships with our donors and partner organisations; and ensuring continued receipt of valuable contributions.

---

<sup>1</sup> An appendix with definitions and explanations of some common forms of corruption is attached at the end of this document.

Note that this Anti-Corruption Policy is related to our [Policy for Sustainable Partnerships](#), which contains guidelines for Kvinna till Kvinna staff on how to fulfil our role as a partner. One of our seven partnership principles is “Mutual accountability and anti-corruption”.

## Zero tolerance

Kvinna till Kvinna has a zero-tolerance approach to corruption. Our stance on corruption, as enshrined in this Anti-Corruption Policy, is to *never accept, always prevent, always inform, always act*.

Zero tolerance means we do not tolerate any form of corruption in relation to our operations; any suspicion of corruption or breaches of this policy should immediately be reported. Kvinna till Kvinna takes all suspicion of corruption seriously. We assess, investigate, act upon and take disciplinary measures in all such cases as appropriate, in a professional, transparent and fair manner.

Compliance with this Anti-Corruption Policy is mandatory for Kvinna till Kvinna staff. Similarly, compliance with the [Anti-Corruption Policy for Partner Organisations and Third Parties](#) is mandatory for partner organisations and third parties, such as hired consultants and contractors. Failure to comply will result in disciplinary action, including the possible termination of the violating party’s employment, agreement or business relationship with Kvinna till Kvinna. We also reserve the right, without prejudice to any other right or remedy available, to take such additional action, civil and/or criminal, as may be appropriate.

## Risk of corruption

In many of the contexts we and our partners operate in, corruption is extensive, institutionalised and even systemic. It poses a risk both internally in our organisation and externally in interactions with partner organisations, rights holders, consultants, public officials and others. We strive to prevent any possibility that the funds we provide might reinforce existing opportunities for corruption or generate new ones. Through this Anti-Corruption Policy, the related Anti-Corruption Policy for Partner Organisations and Third Parties, and our zero-tolerance approach to corruption, we aim to eliminate corruption from our operations and decrease overall levels of corruption in our areas of work.

## Scope

This Anti-Corruption Policy applies internally to Kvinna till Kvinna’s entire organisation (head office, regional and programme offices), including all Kvinna till Kvinna employees, interns, volunteers, Board members and goodwill ambassadors, regardless of their role or tasks.

In other, external collaborations (with partner organisations and third parties), the abovementioned Anti-Corruption Policy for Partner Organisations and Third Parties shall be applied.

Kvinna till Kvinna should ensure partner organisations are aware of and apply the Anti-Corruption Policy for Partner Organisations and Third Parties, which is annexed to all cooperation agreements with partner organisations.

## Responsibility

Kvinna till Kvinna's secretary-general is responsible for informing the organisation's Board about this Anti-Corruption Policy.

All managers at Kvinna till Kvinna are responsible for ensuring all employees are informed about the policy, have read and signed it, and understand how to identify, recognise and handle corruption or the risk thereof.

All employees are required to actively work to prevent corruption by identifying, recognising and acknowledging corruption risks throughout the organisation and reporting suspected cases of corruption.

Individuals who enter into agreements on behalf of Kvinna till Kvinna as an authorised signatory are responsible for ensuring that the respective partner organisation or third party complies with the Anti-Corruption Policy for Partner Organisations and Third Parties.

## POLICY STATEMENTS

### Never accept

Kvinna till Kvinna has a zero-tolerance approach to corruption, meaning we never accept corruption. We want all staff to be aware of corruption and the mechanisms that enable it, work to prevent corruption, and counter its negative impact, with the goal of establishing a fairer, more equal world.

The wellbeing, health and safety of our staff, however, are of the highest importance to us. The zero-tolerance policy should never pose a threat to anyone's life or health. In situations in which staff members' health and safety are at risk, for example, staff should not endanger any lives in an attempt to adhere to this Anti-Corruption Policy. We always strive to protect our staff from dangerous situations. Should such a situation occur after all, then the incident must be reported to Kvinna till Kvinna's local management as soon as it is safe and possible to do so.

### Always prevent

Raising awareness about corruption, internally as well as externally, strengthens the results Kvinna till Kvinna seeks to achieve. We must acknowledge the risk of corruption whenever we establish and apply internal rules and routines.

Most of our funding goes to local partner organisations in the form of core support or funding for projects they run. These local organisations are often based in countries in which corruption is prevalent. To effectively prevent corruption at all stages, we should always collaborate closely with our partner organisations.

We are committed to preventing corruption through appropriate internal controls, checks and balances, training and awareness-raising efforts among staff and partners, due diligence practices when recruiting, and external auditing controls with effective inspections and investigations.

## Always inform

Openness and transparency are crucial in countering corruption.

All staff are obligated to notify the closest possible manager of any suspected corruption. Informants are not required to provide proof or have full knowledge of the case.

Failure to report corruption shall be treated as a serious issue and may result in disciplinary measures. Informants shall not be subject to harassment or reprisals.

Donors, auditors and other stakeholders shall be informed of any case early on by the immediate manager at Kvinna till Kvinna.

Communication managers and press officers shall be informed of any case, allowing them to assess any possible impact on Kvinna till Kvinna's communication work.

## Always act

When a (suspected) case of corruption occurs, Kvinna till Kvinna must immediately take action to minimise any damage and ensure a prompt investigation.

Any decision about how to respond to suspected corruption shall be well-documented, with its potential impact assessed from a conflict-sensitive perspective. Particular attention shall be paid to concerns about how a decision may affect rights holders' lives/security; immediate social processes to address or prevent violence closely connected to the funding in question; and Kvinna till Kvinna's programme in the country/region in general.

Kvinna till Kvinna employees are never to conduct an investigation on their own. All staff are obligated to notify the closest possible manager of any suspected corruption. Kvinna till Kvinna's management is then responsible for developing an action plan and conducting an investigation.

## Internal culture and practices

We have a zero-tolerance approach to corruption in all its forms. Staff are prohibited from engaging in corrupt activities, whether in their work life or private life. Failure to adhere to this will result in disciplinary actions, including the possible termination of employment.

Both the organisation itself and all staff are committed to remaining accountable and transparent, upholding Kvinna till Kvinna's values and integrity, following formal procedures and protecting the funds Kvinna till Kvinna has been entrusted with.

Everyone subject to this policy is obligated to bring forward any corruption related issues, questions, doubts or concerns to Kvinna till Kvinna's management.

Kvinna till Kvinna is committed to ensuring everyone subject to this policy understands the consequences of violating it, understands they have a duty to report any suspected breaches and knows how to do so via Kvinna till Kvinna's reporting mechanisms (either directly to a manager or anti-corruption advisor, or via Kvinna till Kvinna's whistleblowing mechanism, with the option of doing so anonymously).

To avoid corruption in its operations, Kvinna till Kvinna is committed to using transparent, straightforward and clear procedures, monitoring, checks & balances and documentation.

Kvinna till Kvinna and all staff are committed to disclosing any perceived, actual or potential conflict of interest and managing any such conflict in an adequate manner.

Kvinna till Kvinna shall protect its staff from pressure to violate this policy and shall ensure no staff member is granted unchecked discretion.

## External stakeholders

Kvinna till Kvinna is committed to ensuring its partner organisations and third parties are aware of, understand and comply with the Anti-Corruption Policy for Partner Organisations and Third Parties in terms of the responsibilities the policy places upon them, as well as the consequences of breaching it, including the possible termination of the violating party's agreement and/or business relationship with Kvinna till Kvinna. Kvinna till Kvinna is furthermore committed to ensuring that its partner organisations and third parties understand their rights and know how to report suspected corruption to Kvinna till Kvinna.

Kvinna till Kvinna is committed to supporting its partner organisations in their work against corruption, both in terms of prevention and in terms of acting upon suspected corruption.

Kvinna till Kvinna is committed to excluding a partner organisation from receiving Kvinna till Kvinna funds when it is determined that that organisation only obtained access to such funds through corrupt means and is otherwise not entitled to them.

Kvinna till Kvinna is committed to promoting awareness and encouraging the use of its reporting mechanisms, and to ensuring all partner organisations and third parties, as well as any other stakeholders, have safe, easy and trusted access to mechanisms to confidentially report suspected corruption, either by directly reporting to Kvinna till Kvinna staff or by using Kvinna till Kvinna's whistleblowing mechanism, with the option of doing so anonymously.

## Reporting, whistleblowing and investigations

Kvinna till Kvinna is committed to taking all reported suspicions of corruption seriously and assessing, acting upon, investigating and taking disciplinary measures in all such cases as appropriate, according to professional, transparent and fair procedures.

Kvinna till Kvinna is committed to protecting informants' confidentiality and rights and does not tolerate retaliation against informants.

Kvinna till Kvinna is committed to ensuring that the identity of whistleblowers is not made public if requested by third parties.

The whistleblowing procedure to report suspected corruption is described on [Kvinna till Kvinna's website](#). Informants can choose to remain anonymous.

All reports made in good faith will be treated as such, even without initial proof and regardless of the outcome of any investigation.

Kvinna till Kvinna considers knowingly making a false report of corruption to be a violation of this policy. Doing so shall result in disciplinary action, including the possible termination of the violating party's employment, agreement or business relationship with Kvinna till Kvinna.

Kvinna till Kvinna shall seek to recover any assets lost due to corruption.

Kvinna till Kvinna is committed to meeting its obligation to report corruption to relevant donors and external authorities as appropriate.

## Risk management

We are committed to being aware of and understanding the anti-corruption laws and regulations applicable to our programmes and areas of operation. Both we and our staff will comply with applicable international anti-corruption legislation and conventions, the laws of the countries we operate in, and the rules and regulations of our donors. When local law sets a lower standard than this policy or our own administrative procedures, our internal procedures take precedence as long as they do not directly conflict with local law.

We shall learn from cases of corruption, take corrective action and adjust our culture, systems and practices accordingly, to better prevent future cases and ensure compliance.

We are committed to preventing corruption by systematically assessing and reviewing corruption risks in our operations according to our Risk Management Guide. We may implement risk-mitigation measures accordingly, including measures applicable to external parties such as partner organisations or other third parties.

## Gifts and hospitality

Kvinna till Kvinna staff members are prohibited from promising, offering, giving, seeking or accepting personal gifts or other advantages representing more than symbolic value to or from donors, partner organisations, suppliers, authorities or other stakeholders. Any gift(s) constituting an attempt to exert an undue influence on any Kvinna till Kvinna staff or stakeholder are strictly prohibited. Staff involved in the selection of partner organisations will exert enhanced caution in this regard. Cash gifts are strictly prohibited.

If it is impossible for a staff member to reject a gift in a manner that does not compromise Kvinna till Kvinna's work or the individual's health or safety, then the gift may be received but must be reported and handed over to management to become the property of Kvinna till Kvinna. Any such gifts shall be used appropriately for the benefit of Kvinna till Kvinna as an organisation, our projects and/or our partner organisations.

Staff members who have visited an organisation or event as a speaker or official guest may accept token gifts, but these may not be personal (must become the property of Kvinna till Kvinna) and should not be transferable into money.

Staff members who have personal friendships with individuals at partner organisations should not exchange gifts until the collaboration has ceased or the individuals no longer work for Kvinna till Kvinna.

Staff members should never present managers with gifts. No gifts should be exchanged between staff working in programme offices and staff working at the head office.

Kvinna till Kvinna is committed to ensuring that any representation or hospitality promised, given or received is modest, occurs within a standard business framework and aligns with donor regulations. Representation and hospitality must never compromise Kvinna till Kvinna's integrity, credibility, policies and guidelines or otherwise (attempt to) exert an undue influence on any party.

Kvinna till Kvinna strictly prohibits the promising, offering, giving, seeking or accepting of representation, hospitality and gifts for staff involved in a procurement process.

I, the undersigned<sup>2</sup>, confirm that I have read and understood this Anti-Corruption Policy.

Place, date:

---

Name:

---

<sup>2</sup> A signature is acceptable either in this policy or in the document called Acknowledgement of Mandatory Policies.

## APPENDIX

### Glossary

*Note that this glossary defines some, but not all, forms of corruption. Kvinna till Kvinna's Anti-Corruption Policy applies to all forms of corruption, not only those listed here.*

**Abuse of a position of trust** – the improper use of a person's position to materially benefit oneself or any other party.

**Brand fraud** – the use of an organisation's name, branding, or documentation for unauthorised or illegitimate ends.

**Bribery** – giving, paying, promising, offering, accepting of money, gifts, rewards, loans or other advantage to or from any person as an inducement to do something that is illegal, dishonest or a breach of trust in the course of carrying out an organisation's activities.

**Collusion** – the improper collusion of a person with others to avoid, undermine, sidestep or otherwise ignore rules, policies or guidelines.

**Conflict of interest** – a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. A situation in which a person knowingly has an undisclosed interest in another party (supplier, vendor, consultant, etc) involved in a business relationship with the organisation the person is employed at.

**Corruption** – an abuse of trust, power or position that results in improper gain for a person, organisation, political party, company or other.

**Creative accounting** – the exploitation of loopholes in financial regulation in order to gain advantage or present figures in a misleadingly favourable light.

**Double funding** – a situation in which the same costs for the same activity are reported and funded twice or more times by different donors or projects.

**Embezzlement** – the misuse of funds, property, resources or other assets that belong to an organisation or an individual for personal gain.

**Expenses fraud** – the dishonest use of an expenses system to pay money or other benefits to which the recipient is not entitled or the falsification of expense reimbursement reports.

**Extortion** – the unlawful use of one's position to obtain something, especially money, through force or threats.

**Facilitation payments** – unofficial payments made to another party for performing a service or other action that they were required to do anyway by law or their employment.

**False accounting** – the deliberate entry of false or misleading information into any form of accounting or financial record or the deliberate omission of relevant information, including maintaining "off-book" accounts.



**False representation** – an untrue or incorrect representation regarding a material fact that is made with knowledge or belief of its inaccuracy, for example describing oneself as a person holding a high position in an organisation in order to gain some benefit or deceive someone.

**Favouritism** – the practice of giving unfair preferential treatment to one person or group at the expense of another.

**Forgery or Falsification of documents** – the dishonest creation, alteration, signing, or use of all or any part of a document, including, but not limited to, contracts, reports, invoices, receipts or other records.

**Fraud** – any act or omission that intentionally misleads, or attempts to mislead, another party in order to obtain a financial or other benefit or to avoid an obligation.

**Gifts and hospitality** – can range from small gifts (such as flowers) to expensive hospitality (receptions, dinners, tickets to cultural events, holidays, etc). Expensive gift sans hospitality may be used to disguise bribes intended to induce improper behaviour.

**Kickback payments** – the return of a part of a contractual payment that a person improperly receives from a supplier or vendor in exchange for the person’s involvement in an improper or corrupt business transaction or tender process.

**Money laundering** – the concealment of illegally obtained money.

**Nepotism** – the improper use of one’s employment to favour or benefit relatives, friends or other associates.

**Payroll fraud** – the manipulation of a payroll system to make unauthorised payments to oneself or another.

**Procurement fraud** – any dishonest behaviour relating to procurement or tendering processes, for example falsely creating bids or quotes, sharing confidential procurement information with third parties, paying for a product that does not meet the description of the product contracted to purchase, or agreeing to requests for false invoices.

**Sextortion** – the use of power or position to obtain a sexual benefit or advantage. Sextortion is a form of corruption in which sex, rather than money, is the currency of the bribe.

**Tax or Duty Evasion** – the avoidance of paying tax or other duties that a person or organisation is aware should be paid.

**Theft** – the taking of anything of value that belongs to another.