

# ANTI-CORRUPTION POLICY

*The Kvinna till Kvinna Foundation has a zero-tolerance policy on corruption. Kvinna till Kvinna's stance on corruption is to:*

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

## Introduction

Activities commonly referred to as corruption are not always regarded as illegal in the eyes of the law. Sometimes corruption is more about the violation of accepted ethics and morals.<sup>1</sup>

Corruption exists in all societies and most individuals have the same tendencies to act corruptly under certain circumstances. Corruption occurs both on a large and small scale. Kvinna till Kvinna takes a stance against all possible irregularities that may arise.

Corruption hinders development and contributes to the unequal allocation of resources. Corruption affects the poorest societies and exacerbates the plight of vulnerable people. Women are disproportionately affected as they often represent a larger share of the poorest and most vulnerable people in society. It is therefore particularly important for Kvinna till Kvinna to work against corruption.

Corruption can occur when the possibility of obtaining personal benefits arises.<sup>2</sup> An active approach is required to prevent corruption. As corruption is hard to detect, and difficult and costly to investigate, prevention is very important. Clear guidelines, good routines and

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<sup>1</sup> Cf. Kvinna till Kvinna's Guidelines for the Code of Conduct in Personalhandboken (Employee Handbook)

<sup>2</sup> Cf. section about the abuse of a position of power in the Guidelines for the Code of Conduct in Personalhandboken (Employee Handbook)

systems are important tools to detect and prevent corruption. It is also important to work with raising awareness and documentation.

When corruption is deemed to be a criminal offence, it must be reported to the police and may, in case of conviction, result in dismissal. Corrupt behaviour, or the failure to detect it, may result in a withdrawal of funding for partner organisations. This may subsequently lead to prosecution and an obligation to repay funding received.

## 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 includes bribery, kickbacks, extortion, favouritism and nepotism, as well as conflicts of interest, embezzlement and fraud.

## Scope

This anti-corruption policy should permeate the entire Kvinna till Kvinna organisation – nationally and internationally – and should be applied both internally and during collaborations with partner organisations.<sup>3</sup>

The policy applies to all Kvinna till Kvinna employees and all partner organisations, in all positions and for all tasks.

Kvinna till Kvinna should ensure that partner organisations are aware of the policy and that they apply it.

Partner organisations should have other (their own) channels to report suspected cases of corruption, in addition to those mentioned in this document.

## Responsibility

The secretary-general is responsible for informing the board about the Kvinna till Kvinna Anti-Corruption Policy.

All managers at Kvinna till Kvinna are responsible for ensuring that all employees receive information about the anti-corruption policy and how they should identify, recognise and handle corruption risks.

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<sup>3</sup> Cf. section about corruption in the Guidelines for the Code of Conduct in *Personalhandboken* (Employee Handbook)

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

Those individuals who enter into agreements, as an authorized signatory, with Kvinna till Kvinna are responsible for ensuring that the respective partner organisation complies with this anti-corruption policy.

## Never accept

Kvinna till Kvinna has zero tolerance against corruption. This means that we will never accept corruption. However, the zero-tolerance policy must not pose a threat to an individual's life or health, or that of others.

In a threatening situation, individuals' safety is always paramount. If an employee feels compelled to participate in corrupt behaviour (eg. being forced to pay for something that should be free), this should be documented and reported, so that we can analyse if and how this situation could have been prevented and thus be able to act against corruption in the future.

Never accepting means that individuals are aware of and work against the profoundly negative impact of corruption, and thereby a more equal and fair world. Never accepting also means knowing about which mechanisms are hidden behind corruption so as to be able to work to prevent corruption.

## Always prevent

There are some common situations that may pose a risk for corruption:

- Opportunity: Prevention means minimising opportunity
- Organisational culture: messages from management, lack of transparency
- Tolerance in society

Raising awareness about corruption internally is essential to achieve results. Kvinna till Kvinna must acknowledge corruption risks when establishing and applying internal rules and routines.

Most of Kvinna till Kvinna's funding is used to support projects at local partner organisations in countries where corruption is prevalent. Anti-corruption work should occur in collaboration with our partner organisations in order to be effective. A significant part of anti-corruption work involves adapting the collaboration with local organisations to minimise the risks for corruption at all stages.

## Always act

When suspected irregularities or cases of corruption concerning partners organisations arise, Kvinna till Kvinna must immediately take action to minimise any damage and ensure a prompt investigation. The team and its controller will initiate the work. The respective regional / departmental manager has the main responsibility for the investigation and decisions about appropriate actions.

In case of suspected irregularities/corruption, the action plan should be completed and all correspondence should be logged by the respective team/individual. These papers should be archived by the anti-corruption advisor.

Anti-corruption advisors are available for support and, as necessary, another individual may be assigned to a specific case. In cases where these individuals are suspected of being involved or biased, this must be reported to the top management and, finally, the Chairperson of the Board. Suspicions of fraud or corruption can also be reported to the organisation's auditor.

A whistleblowing procedure is described on Kvinna till Kvinna's website, where individuals can anonymously report suspected cases of corruption concerning activities.

When suspected crimes are reported to the police, the general rule is that the police will take over the investigation.

Experience shows that in order to identify corruption a special audit focused on corruption must be included in audits. When describing such special audits, it should therefore be explicitly stated that the purpose of the audit is a corruption investigation.

## Always inform

An open and transparent approach is important when working against corruption. Anyone who suspects irregularities is not required to provide proof or have full knowledge of the case. Anyone reporting suspected irregularities must not be subjected to harassment or reprisals.

Donors, auditors and other stakeholders should also be informed early on by the immediate manager at Kvinna till Kvinna.

Communication managers and press officers should be informed to assess any possible impact on Kvinna till Kvinna's communication work.

## Gifts

Kvinna till Kvinna also enforces zero tolerance on gifts. Bribery is a criminal offence in Sweden. It is therefore illegal to accept gifts and this may be subject to legal proceedings. The



relationship between the benefactor and the recipient will determine whether it is a gift or a bribe.

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

Individuals who have visited an organisation or event as a speaker or an official guest may accept token gifts, but they must not be personal (accrue to Kvinna till Kvinna) and they should not be transferable into money.