



Policy on Preventing Corruption and Fraud in CBMeV's Activities and Operations

Preamble

The diversion of resources or misuse of power for personal gain compromises CBM's core values such as Integrity and Professionalism, the Code of Conduct of the CBM family and our accountability to our beneficiaries, their communities and our donors around the world.

Indications that CBMeV is linked to corruption can be damaging to CBM's reputation - undermining the morale of our staff and the trust and support of beneficiaries, partners, donors and the wider public. Corruption also poses legal risks both for the organisation and individuals involved. We must act, and be seen to act, in a way that is honest and transparent.

This policy supports CBM's existing programme, human resource and financial policies and standards, reinforcing CBM's commitment to foster an organizational culture in which corruption is never acceptable and not tolerated. It further clarifies standards of conduct for the prevention of corruption and provides a common foundation for the development of procedures to manage CBMeV's corruption risk across all departments. It also intends to help CBM employees across all levels and locations who sometimes have to deal with difficult situations where critical choices must be made.

The Anti Corruption Policy and its associated procedures will be reviewed as deemed necessary to ensure the content reflects current needs and international best practices.

Definition

"Corruption is 'the abuse of entrusted power for private gain' and can be instigated by individuals in the public or private sector. It is interpreted here to include such corrupt practices as bribery, fraud, extortion, collusion, conflict of interest, and money laundering. In this context, it includes an offer or receipt of any gift, loan, fee, reward, or other advantage to or from any person as an inducement to do something that is dishonest, illegal, or a breach of trust in the conduct of the enterprise's business. This may include gifts other than money, such as free goods and holidays, or special personal services provided for the purpose of, or liable to result in, an improper advantage or that may result in moral pressure to receive such an advantage."¹

Policy Statements

1. Corruption on the part of any CBMeV employee or board member or any third party (partner, consultant, supplier etc.) in their engagement with CBMeV, is prohibited. Respective clauses are integral part of work, service or project contracts.
2. No employee or board member, or any third party acting on behalf of CBMeV or dealing with CBMeV, shall offer to pay a bribe, or pay a bribe, nor shall they solicit the payment of a bribe, or accept a bribe in conjunction with any aspect of CBM's activities.

¹ Definition Source: Global Reporting Initiative (GRI) Guidelines; accredited by the INGO Accountability Charter Ltd.

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3. Employees of CBMeV who commit a corrupt act, fail to report knowledge of corruption or fail to manage the risk of corruption will be subject to disciplinary action up to and including termination of employment. Members of Boards who fail to comply with this policy are subject to removal. Third parties who fail to comply with this policy will have their agreements and/or contracts with CBMeV terminated. CBMeV may also seek restitution or prosecution or other legal remedies.
4. CBMeV will foster an organisational culture in which corruption is never acceptable and will not be tolerated.
5. CBMeV will implement “whistleblower” procedures to provide employees, board members, and third parties with a mechanism to ensure that anyone who reveals corruption and evidence of misconduct in CBM operations is protected from reprisals. CBMeV encourages such reporting. CBMeV will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of CBMeV, or of another individual or entity with whom CBMeV has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.
6. CBMeV will develop a corruption response plan documenting how incidents will be investigated, reported, closed and clarifies the regime of corruption related sanctions.
7. CBMeV will include a corruption risk assessment within its overall risk management. The risk assessment is conducted by the executive management and supervised by the CBMeV Board.
8. CBMeV will ensure employees, board members, partners and other third parties that engage with CBMeV are made aware of the Anti-corruption Policy.
9. CBMeV will train and raise awareness about preventing fraud and corruption and provide regular web-based anti-corruption training to all staff at International Office, Regional and Country Office level.
10. CBMeV will immediately report all instances of corruption to the local governing body, where one exists (except in cases where the allegation is directed at that body), which is responsible and accountable for ensuring the incident is investigated appropriately.
11. All incidents of suspected and actual corruption will immediately be reported by all CBMeV employees and board members to CBMeV Internal Audit, who shall assess what other CBM departments and or parties should be notified (e.g. President, Board committees, funding Member Associations or Human Resources Department).

The Executive Management has the responsibility and authority to take actions as necessary to ensure the effective implementation of this policy. On a periodic basis, compliance with this Anti-corruption Policy and its required controls will be reviewed and tested by CBMeV Internal Audit.