

Anti-Corruption policy

0. Introduction

This policy sets out IUCN NL's commitment to the prevention and detection of corruption. This policy applies to IUCN NL as an organization and to all persons that work in, for, or on behalf of IUCNNL.

The objective of this policy is to provide an overview of integrity issues, the preventive measures to be taken, signals of corruption, research to be conducted and the appropriate responses. Proper attention to managing integrity risks and corruption may divert financial loss, reputation loss and ultimately may increase IUCN NL's fundraising potential.

This Anti-Corruption policy intends to be a reference document for IUCN NL staff members in general and especially managers on avoiding and handling corruption-related issues. Furthermore, it is a tool to build awareness of the challenges related to corruption. This Anti-Corruption Policy is part of the Due Diligence procedures of IUCN NL in relation to developing partnerships, committing to financial partnerships, or in the making of payments to third parties.

1. Definition of Corruption

IUCN NL defines corruption as:

the abuse of entrusted power for illegitimate individual or group benefit

IUCN NL will not accept the use of power, be it formal power in decision making either entrusted to IUCN NL managers, staff, or partner organizations or the use of financial support given to managers, staff, or partner organizations to implement particular projects, for the purpose of self-enrichment, criminal or other illegitimate activities, or for the use of inappropriate coercion of staff, partners, or other third parties. All of the described acts in this paragraph can be described as corruption. This is further defined below.

Corruption can involve both financial and non-financial benefits such as enhanced personal reputation, the acquisition of political capital or access to services. Corruption might occur in many forms, including but not limited to:

- Bribery¹: When someone improperly provides goods or services against some form of improper compensation.
- Embezzlement: Theft of resources for one's own use.
- Extortion: The act of obtaining something by force, threats or undue demands.
- Favouritism: The unfair favouring of one person or a group at the expense of others and includes nepotism, which is favouritism shown to relatives.

2. IUCN NL does Not Tolerate Corruption

IUCN NL does not tolerate any type of corruption as defined in section 1. In the case of corruption at management or staff level, IUCN NL's ability to effectively, efficiently, and credibly achieve its mission is seriously undermined, if not significantly damaged. The same holds true for the ability of partner organizations to achieve their missions if corrupt practices are tolerated. Next to that, corruption in general undermines good governance and the achievement of a cost-effective sustainable development policy. Corruption especially hurts the poor by denying them free and fair access to the services that they are entitled to.

To prevent abuse of entrusted power for private gain and guarantee that donors' money is well spent, IUCN NL is committed to fighting all types of corruption. IUCN NL lives up to this commitment

¹ a "bribe" is defined as an "...offer, promise, or giv(ing) of any undue pecuniary or other advantage, whether directly or through intermediaries, To any public official of any type or their representatives, in order that the official act or refrain from acting in relation to the performance of official duties, in order to obtain or retain business or other improper advantage in the conduct of international business." (OECD, 2000)

by:

- Requiring full transparency of Directors, management and staff of IUCN NL in all their activities, and holding Directors, management, and staff of IUCN NL accountable if any breaches of this policy are established.
- Requiring employees and counterparts to report suspected cases of corruption, and providing them with suitable channels of communication and ensuring sensitive information is treated appropriately (see section 3 & 4). If it is found that employees and counterparts knowingly did not report suspected cases of corruption, they will be held accountable.
- Rigorously investigating instances of alleged corruption and taking firm and vigorous action against any employee or counterpart involved in corruption.
- maintaining and enforcing additional policies and procedures for countering corruption.

3. Internal rules

IUCN NL prides itself on its own internal integrity standards. Nevertheless, IUCN NL does have a sanction policy which also relates to corruption of IUCN Governing bodies, Directors, Management, or Staff.

- Staff members and members of governing bodies should not, directly or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain a contract or other improper advantage.
- Staff members and members of governing bodies are not allowed to receive gifts, with the exception of courtesy gifts of a limited pre-determined value (set at 30 Euros). Gifts of a high value are to be handed over to Heads of Units who will ensure they are processed properly in the organization (stored, deposited on accounts, or distributed through a lottery to members of staff).
- All members of governing bodies, directors, management or staff are required to report the receipt of all gifts. Failure to do so will result in a disciplinary sanction.

4 Reporting suspicion of corruption

All stakeholders, including all persons that work in, for, or on behalf of IUCN NL may approach (the board of) IUCN NL with their grievances or complaints related to possible cases of fraud or corruption. IUCN NL commits to investigating and retaliating suspected cases of corruption. In addition to the specific responsibilities listed below, all employees should also adhere to IUCN NL's Code of Conduct, which provides guidance on our core values and guiding principles and commitment to transparency and accountability.

Employee's Responsibilities

All employees and volunteers of IUCN NL are responsible for:

- Acting with propriety in the use of IUCN NL's assets and resources;
- Alerting their line manager in case of:
 - o any suspected or actual fraud or corruption;
 - o any suspicious act or event which might give rise to a suspicion of fraud or corruption;
- Assisting in any investigations by making available all relevant information and by cooperating in interviews.

If for any reason a member of staff does not feel able to report a suspected fraud or corruption to their line manager, he/she should inform a more senior manager or the director of IUCN NL. Ultimately, the governing bodies of IUCN NL may be informed, if the instance involves the involvement of a director of IUCN NL.

Subcontractor/Partner Responsibilities

Subcontractor or partner organizations obligations are detailed in IUCN NL's contractual agreements with the Subcontractor/Partner. Subcontractor or partner organizations must report any suspected fraud or corruption.

In addition, the IUCN NL's Complaints Procedure outlines the protocol and procedures for actions to be taken on receiving complaints, including information about or suspicion of the possibility of

unlawful expenditures by subcontractors/ partner organizations of IUCN NL. This procedure also describes how IUCN NL processes complaints, including how it keeps a record of these complaints in a register. Cases of serious fraud will be reported to the appropriate authorities in accordance with applicable law.

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