



EWEI Anti-Corruption, Conflict of Interest, and Whistle-blowing Policy 201806

The aim of this policy is to confirm Empowering Women for Excellence Initiative (EWEI)'s commitment to good governance, and in particular to provide guidance for actions to prevent corruption and conflicts of interest, and to ensure protections for whistle-blowers.

"Coercive practice" means impairing or harming, or threatening to impair or harm, directly or indirectly, any party or its property, or persons closely related to a party, to improperly influence the actions of that party.

"Collusive practice" means an arrangement between two or more entities without the knowledge of a third party, designed to improperly influence the actions of the third party;

"Corrupt practice" means the offering, giving, receiving or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party; "Donor" means any individual or legal entity who has donated support of funds or value-in-kind goods or services to EWEI.

"Fraudulent practice" means any action intended to deceive another party in order to improperly obtain a financial or other benefit or avoid an obligation. It includes:

- Theft
- Obtaining property, a financial advantage, or any other benefit, by deception
- Providing false or misleading information
- Failing to provide information where there is an obligation to do so
- Making, using or possessing forged or falsified documents
- Bribery, corruption or abuse of office
- Unlawful use of assets (including stationery, telephones, vehicles, photocopiers, computers, office premises) or other property or services;



“Reprisal” means an act taken against a EWEI employee or other entity for their revealing non-compliance with EWEI regulations and rules by any individual or legal entity.

“Whistle-blower” means an EWEI employee or any third party who reveals corruption in an EWEI activity by contacting EWEI or any legal authorities, either anonymously or openly.

“Whistle-blower protection” means measures taken to ensure that anyone who reveals fraud and corruption in EWEI operations is protected from reprisals.

EWEI is committed to promoting and adhering to the highest standards of probity and accountability in the use of its funding and takes a zero-tolerance stance towards cases of corrupt, fraudulent, collusive, or coercive practices. Such practices may include bribery used to influence the award of contracts, theft and misuse of EWEI or Donor assets, falsification of accounts to cover diversion of EWEI / Donor funds to personal accounts, abuse of official discretion or disclosure of privileged information to help friends and relatives.

EWEI shall apply a zero-tolerance policy where it has determined, through an investigation performed by EWEI or by other legal authorities of competent jurisdiction, that fraudulent, corrupt, collusive or coercive actions have occurred in any EWEI activity, and shall enforce a range of sanctions in accordance with the provisions of applicable EWEI rules and regulations, and agreements in place with partner organisations. Such measures will include referral to the competent legal authorities where warranted. Where such cases concern individuals employed by another entity, EWEI shall take all possible steps to ensure that the other entity takes appropriate actions in a manner consistent with this policy. “Zero tolerance” means that EWEI will pursue all allegations falling under the scope of this policy and that appropriate sanctions will be applied where the allegations are substantiated.



EWEI shall take all possible actions to protect from reprisals individuals who help reveal corrupt practices in any EWEI activity and individuals or entities subject to unfair or malicious allegations.

All EWEI, Volunteers, partner organisations and consultants are obliged to comply with the following reporting practices:

Reporting procedures for fraudulent, corrupt, collusive or coercive actions:

- All suspected cases of fraudulent, corrupt, collusive or coercive actions must be reported immediately (within 24 hours of it coming to your attention);
- If you detect a case, or suspect that a case of fraudulent, corrupt, collusive or coercive action may have been committed, or receive an allegation that if true would amount to such a case, then:
 - You must report any suspected case, even if you do not have complete proof or you are not absolutely sure whether it is a case or not.
 - Your obligation is to report it as a suspected case. An investigation will then follow to find out more about the case and whether it does amount to fraudulent, corrupt, collusive or coercive action or not.
- If you fail to report a case of possible fraudulent, corrupt, collusive or coercive action that has come to your attention, you yourself are guilty of an offence.
- Any suspected case should be reported to EWEI's Programme Director within 24 hours. If the suspected case involves the Programme Director, then it should be reported direct to the Secretary of the Board of Trustees.
- REMEMBER: you do not need proof before reporting an alleged or suspected case of fraudulent, corrupt, collusive or coercive action.
- REMEMBER: if you fail to report a suspected case, you yourself are guilty of a serious offence.



Conflict of Interest:

All members of the board and staff of EWEI have a clear obligation to conduct all affairs of the organisation according to the highest ethical standards. Loyalty, honesty, truthfulness and moral virtue are expected to be upheld in all actions of the board and staff. All members of the board and staff of EWEI agree to place the welfare of the organization above personal interests, interest of the family members, or others who may be personally involved in substantial affairs affecting the organisation's basic functions.

General Disclosure: All members of the board and staff of EWEI shall disclose all relationships and business affiliations which may now, or in the future potentially conflict with the interests of the organization or bring personal gain to them, their family business.

Reporting of Disclosures: All disclosures required by the staff will be handled by the Programme Director. All disclosures of the Programme Director and of members of the board shall be referred to the board. Information disclosed will be held in confidence except when EWEI's best interest would be served by bringing the information to the attention of the board and/or other staff of the organisation, or any other competent authorities.

Determination of Possible Conflict of Interest: Any individual who is uncertain about a conflict of interest in any matter shall disclose such possible conflict to the appropriate individual as noted above.

Failure to Disclose: Each member of the board and staff of EWEI should recognize that disclosure of personal and business interest is a requirement for continued membership of the board or employment with the organization, and deliberate failure to disclose a potential conflict of interest could result in termination of membership of the board, or termination of employment.

All additional provisions regarding conflict of interest are provided in the Code of Conduct.



Conflict of Interest Disclosure Statement

With regard to my role as _____
at Empowering Women for Excellence Initiative (EWEI), I have the following potential
conflict of interest to report

Examples of conflict of interest could be affiliation to another NGO, affiliated to any vendor, supplier, or any other party providing or bidding for providing services, having a direct or indirect interest in any business transaction(s), agreement, investment with EWEI, having any business dealings or transaction with a vendor, supplier or any other party which could result in benefit to me etc.

I hereby confirm that the disclosure made above are complete and correct to the best of my information and belief. I shall not be participating in the discussion and decision making of this matter. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the conflict of interest policy, I will notify [the SecBOT or Programme Director immediately.

Signature:

Name & Designation:

Date:



Whistle-blowing:

EWEI requires all EWEI Representatives (management, staff and volunteers) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and to comply with all applicable laws and regulatory requirements.

Reporting Responsibility: EWEI seeks to have an “Open Door Policy” and encourages EWEI Representatives to share their questions, concerns, suggestions or complaints regarding the organisation and its operations with someone who can address them properly including technical advisers and management.

No Retaliation: No EWEI Representative who in good faith reports an actual or suspected violation of a law or regulation or policy requirement shall suffer harassment, retaliation or adverse employment consequence.

Compliance Officer: EWEI’s Programme Director Officer, working with the Secretary of the Board, will act as Compliance Officer. The Compliance Officer is responsible for investigating and resolving all complaints and allegations concerning violations of any law or regulation or policy.

Accounting and Auditing Matters: The Technical Adviser Finance and Supplies shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Technical Adviser of any such complaint and work with the Committee until the matter is resolved.

Confidentiality: Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations: The Compliance Officer, or the person responsible for carrying out the Compliance Officer’s role will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.