



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

202010

This policy aims to confirm Empowering Women for Excellence Initiative (EWEI)'s commitment to good governance, mainly to guide actions to prevent corruption and conflicts of interest and ensure protections for whistle-blowers.

Definition of Terms

1. Coercive Practice: 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;
2. Collusive Practice: An arrangement between two or more entities without the knowledge of a third party, designed to influence the actions of the third party improperly;
3. Corrupt Practice: The offering, giving, receiving or soliciting, directly or indirectly, of anything of value to improperly influence the actions of another party;
4. Donor: Any individual or legal entity that has donated support of funds or value-in-kind goods or services to EWEI.
5. Fraudulent Practice: Any action intended to deceive another party to illegally 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;
6. Reprisal: An action taken against an EWEI employee or other entity for their revealing non-compliance with EWEI regulations and rules by any individual or legal entity.



7. Whistle-blower: EWEI employee or any third party who reveals corruption in an EWEI activity by contacting EWEI or any legal authorities, either anonymously or openly.
8. Whistle-blower Protection: 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 integrity 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, but are not limited to; using bribery 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 persons outside the organisation.

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 according to applicable EWEI rules and regulations and agreements with partner organisations. Such measures may include (but not limited to), 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.

In addition, 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

1. All suspected cases of fraudulent, corrupt, collusive or coercive actions must be reported immediately (within 24 hours of it coming to your attention);
2. If you detect 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:
 - a. You must report any suspected case, even if you do not have complete proof or are not sure whether it is a case or not.
 - b. You must report it as a suspected case, after which an investigation will follow to gather more evidence in determining if it amounts to a fraudulent, corrupt, collusive or coercive action or not.
3. If you fail to report a case as stated in (2) above, you may be found guilty of collusion
4. Any suspected case should be reported to EWEI's Programme Director within 24 hours. If the alleged case involves the Programme Director, it should be reported directly to the Secretary of the Board of Trustees. Remember, you do not need proof before reporting any alleged or suspected case of fraudulent, corrupt, collusive or coercive action.



CONFLICT OF INTEREST

All members of the board and staff of EWEI have a clear obligation to conduct all organisation affairs with the highest ethical standards. Loyalty, honesty, truthfulness, and moral virtues are to be upheld in all actions of the board and staff. All members of the board and staff of EWEI **must** agree to place the organisation's welfare above personal interests, the interest of family members and personal associates who may be involved in substantial affairs affecting the organisation's essential functions.

General Disclosure: All members of the board and staff of EWEI shall disclose all relationships and business affiliations that may potentially conflict with the organisation's interests or bring personal gain to them.

Reporting of Disclosures: All disclosures required by staff will be handled by the Programme Director and disclosures of the Programme Director and members of the board shall be referred to the board. Information disclosed will be held in strict 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 to the appropriate individual as noted above.

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



Conflict of Interest Disclosure Statement

With regards to my role as _____

at Empowering Women for Excellence Initiative (EWEI), I have the following potential conflict of interest to report.....

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

I hereby confirm that the disclosure made above is complete and correct to the best of my information and belief. I shall not be participating in any discussion and decision making on 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 Secretary Board of Trustees 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 questions, concerns, suggestions or complaints regarding the organisation or its operations with their Line Supervisors, technical advisers or 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: All Staff are mandated to comply with EWEI's Anti-corruption, Conflict of Interest and Whistle-blowing policy. To ensure compliance, the Human Resource-Protection Officer, who doubles as the Compliance Officer is responsible for investigating and resolving all complaints and allegations concerning violations of any law, regulation, or policy. The Compliance Officer reports to the Programme Director.

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 confidentially or anonymously by the complainant. Reports of violations or suspected violations are kept confidential and subjected to an appropriate investigation.

Handling Reported Violations: The Compliance Officer shall acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within 24 – 48 hours. All reports will be promptly investigated, and appropriate action taken as determined by the outcome of the investigation.