

## **Anti-Corruption Policy**

Corruption in international policies is defined as the abuse of entrusted power for private gain. It may occur both in public and private sectors, including civil society actors that can be individuals or organisations. Corruption may be abuse of power or gaining benefit, either in terms of money or undue advantage.

**TOF's Code of Conduct** requires staff and associated partners observe the highest standards of ethics and not engage in any corrupt practice, meaning of offering, giving, receiving or soliciting of anything of value to manipulate the action of public or other officials in order to influence a selection process or the execution of contracts. The fact that bribery may be an accepted local practice in a country does not relieve TOF of its duty to comply with this policy.

**TOF staff** (permanent/part-time/consultants) may become aware of material information about other companies or partners which is not available to the public and which may be bound to non-disclosure agreements (NDA). The use of such material and/or non-public information by employees for their own financial benefit or that of a family or acquaintance is against TOF policy and a breach of the law.

**TOF's Anti-Corruption Policy** is based on international agreements and anti-corruption policies. Our policy is in line with the UN Convention against Corruption, the OECD Anti-bribery Convention, the policies of the Norwegian Government, European Union, World Bank, Asian Development Bank, and other international development financing institutions. TOF's procedures to prevent and discover corruption and bribery follow the guidance and practices of the Transparency International and the U4 Anti-Corruption Resource Centre in Norway.



**Transparency, accountability and openness are underlying principles in TOF's organisational culture,** in all its activities and operations. It is strictly forbidden for any employee of TOF, its partners or associates to exploit any relationships related to TOF's activities and operations for his/her own personal gain. Anyone associated with TOF is never allowed to give any undue payment or other consideration to any person or entity for the purpose of inducing that person or entity to act in favour of TOF, its partners or associates or any other entity or person. It is never acceptable to receive any undue payment or other consideration from any person or entity for the purpose of acting in favour of that person or any entity or other person he/she may represent.

**TOF, its partners and associates** shall respect and always follow international agreements and available national policies on corruption, and abide to any type of anti-corruption policy in the country of work. Anyone associated with TOF shall work pro-actively to prevent corrupt practices, even when it is not part of the duties or assignment of the individual. Any suspicion of corrupt practices shall be reported using TOF's whistleblowing channel.

All employees of TOF, its partners and associates will be informed and made aware of TOF's strict non-tolerance of any form of corrupt behaviour. Employees who detect corruption or other malpractice in the course of their work are encouraged to immediately report this through TOF's whistleblowing channel. Employees and persons connected with TOF, its partners and associates will be informed of how to report any suspicion of corruption through TOF's whistleblowing channel, and they will be ensured of their right to anonymity.



## Information and Reference Sources

Asian Development Bank on anticorruption: <a href="https://www.adb.org/site/integrity/main">https://www.adb.org/site/integrity/main</a>

Council of Europe: European Consensus of Development 2017:

https://ec.europa.eu/international-partnerships/european-consensus-development en

European Union (EU) policy against corruption: <a href="https://ec.europa.eu/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption">https://ec.europa.eu/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption</a> en

 $NORAD\ on\ anticorruption: \underline{https://norad.no/en/front/thematic-areas/democracy-and-good-governance/combating-corruption/}$ 

OECD Anti-bribery Convention: <a href="http://www.oecd.org/corruption/data-on-enforcement-of-the-anti-bribery-convention.htm">http://www.oecd.org/corruption/data-on-enforcement-of-the-anti-bribery-convention.htm</a>

*Preventing Corruption*. A handbook of anti-corruption techniques for use in international development co-operation. Ministry for Foreign Affairs of Finland 2005.

Transparency International: https://www.transparency.org/en/#

U4 Anti-Corruption Resource Centre: https://www.u4.no

United Nations (UN) Convention against Corruption: <a href="http://www.unodc.org/unodc/en/treaties/CAC/index.html">http://www.unodc.org/unodc/en/treaties/CAC/index.html</a>

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