



## ANTI-CORRUPTION POLICY

### Zero Tolerance for Corruption

DRC's Anti-Corruption Policy is based upon a zero tolerance approach to corruption. Zero tolerance means that DRC does not tolerate corruption in relation to any of our work and that all suspicions of corruption thought to be in breach of this policy are reported to DRC. It means that DRC will take all suspicions of corruption seriously and assess, act upon, investigate and discipline all such cases as appropriate and in a professional, transparent and fair manner. Compliance with this policy is mandatory for staff, implementing partners, contractors and related Third Parties. Failure to do so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with DRC. DRC furthermore reserves the right, without prejudice to any other right or remedy available to it, to take such additional action, civil and/or criminal, as may be appropriate.

### Upholding DRC's Values and Integrity

At DRC, we believe in conducting our work ethically, honestly, and in full compliance with all laws and regulations applicable to the respective contexts in which we work. Our commitment to doing our work the right way is a crucial part of what makes us DRC. We follow a rights-based approach to our work grounded in the humanitarian principles of humanity, neutrality, impartiality and independence.

Corruption, in contrast, poses a direct threat to DRC's values and its ability to work according to a rights-based approach, humanitarian principles and its commitment to *do no harm*. It has profound adverse effects on social, economic and political development, disproportionately harms the poor and vulnerable, including refugees, and distorts the proper and effective conduct of DRC's work. Any direct or indirect involvement in corruption poses a serious threat to DRC's integrity and credibility, and could severely harm its people of concern. Preventing corruption in its work is therefore not only a priority for DRC, but a necessity dictated by its mandate and a requirement for all staff, implementing partners, contractors and related Third Parties.

### Safeguarding DRC's Entrusted Means

DRC works with entrusted means in the form of funds and other resources entrusted to the organisation by public and private donors for proper, efficient and effective use in its international operations. DRC has an obligation towards these donors to ensure that these means and DRC activities are not subject to corruption. All staff, as well as all others working with DRC assets, therefore have a responsibility to ensure that corruption is prevented in DRC activities.

### Corruption Risk

Corruption is extensive, institutionalised and even systemic in many of the environments in which DRC operates around the world. It poses a risk both internally in the organisation and externally in interactions with people of concern, public officials, contractors and others. DRC operates in national locations where the responsible governments often have little capacity to tackle corruption. DRC thus strives to prevent any possibility that the assistance it provides might generate new corruption opportunities or reinforce existing ones. Not only this, but through its Anti-Corruption Policy and strict zero tolerance approach to corruption, DRC also aims to eliminate corruption from its work and to reduce overall levels of corruption in its areas of operation.



## Corruption Definition

DRC's definition of corruption includes all forms of *fraud* and constitutes serious misconduct in accordance with DRC's Code of Conduct. DRC adopts the following definition for corruption:

*Corruption is the misuse of entrusted power for private gain.*

This definition is not limited to interactions with public officials and covers both attempted and actual corruption, as well as monetary and non-monetary corruption. Examples of the forms corruption takes include, but are not limited to: facilitation payments, bribery, gifts constituting an undue influence, kickbacks, favouritism, cronyism, nepotism, extortion, embezzlement, misuse of confidential information, theft, and various forms of fraud, such as forgery or falsification of documents, and financial or procurement fraud.

## POLICY STATEMENTS

### Internal Anti-Corruption Culture and Practices

- DRC has a zero tolerance for corruption in all its forms. Staff members are prohibited from engaging in corrupt activities, both in their work and in their private life. Failure to do comply will result in disciplinary action up to and including the possibility of termination of employment.
- DRC and staff are committed to staying accountable and transparent, to upholding DRC's values and integrity, to following formal procedures, and to safeguarding DRC's entrusted means.
- It is the obligation of everyone subject to this Anti-Corruption Policy to bring forward any related issues, questions, doubts or concerns to DRC management.
- DRC is committed to ensuring that everyone subject to this Anti-Corruption Policy understands: a) the consequences of violating the policy as it applies to them; b) their duty to report all suspicions of corruption thought to be in breach of this policy to DRC; and 3) how to do so via DRC's Code of Conduct Reporting Mechanism: [drc.dk/relief-work/concerns-complaints/code-of-conduct-reporting-mechanism](https://drc.dk/relief-work/concerns-complaints/code-of-conduct-reporting-mechanism).
- DRC is committed to using transparent, straightforward and clear procedures, monitoring, checks and balances and documentation in order to avoid corruption in our work.
- DRC is committed to avoiding conflicts of interest.
- DRC is committed to ensuring that any representation or hospitality promised, given or received is modest, occurs within a standard business framework and aligns with donor regulations. Representation and hospitality must never compromise DRC's integrity, neutrality, policies and guidelines, or otherwise exert or attempt to exert an undue influence on any party.
- Staff members are prohibited from promising, offering, giving, seeking or accepting personal gifts or other advantages representing more than *token value* to or from persons of concern, donors, implementing partners, suppliers, authorities or other DRC stakeholders. Any gift(s) constituting an attempt to exert an undue influence on any DRC staff or stakeholder are strictly prohibited. Staff involved in partner and beneficiary selection will exert enhanced caution in this regard. All cash gifts are strictly prohibited.
- DRC strictly prohibits the promising, offering, giving, seeking or accepting of representation, hospitality and gifts for staff involved in the procurement process.



- If it is not possible for a staff member to reject a gift in a manner that does not compromise DRC's work or her/his health or safety, then the gift may be received but must be reported and handed over to management to become the property of DRC. Any such gifts must be used appropriately for the benefit of DRC as an organisation, its projects and/or its beneficiaries.
- DRC will protect staff members from pressures to violate this policy and will ensure that unchecked discretion is never awarded to any member of staff.
- DRC holds the well-being, health and safety of its staff members to be of paramount importance. In situations of duress when health and safety are in imminent danger, for example, staff should not endanger their lives or the lives of others due to strict adherence to DRC's Anti-Corruption Policy. DRC will strive to prevent staff members from falling victim to such situations. Should they occur, however, then such incidents must be reported to DRC local management as soon as it is safe and possible to do so.

## External Stakeholders

- DRC is committed to ensuring that its beneficiaries understand their rights and entitlements and how to report suspected corruption to DRC, as well as the standards and behaviour demanded of DRC staff and others subject to this Anti-Corruption Policy.
- DRC is committed to preventing its beneficiaries from falling victim to corruption.
- DRC is committed to excluding a given person from receiving DRC benefits when it is determined that that person has only obtained access to such benefits through corrupt means and is otherwise not entitled to them.
- DRC is committed to ensuring that its implementing partners, contractors and related Third Parties know, understand and comply with this Anti-Corruption Policy in terms of the standards and behaviour the policy demands of them, as well as the consequences of breaching it, up to and including the possibility of termination of the violating party's contract and/or business relationship with DRC.
- DRC is committed to promoting awareness and use of its complaints and reporting mechanisms and to ensuring that all DRC stakeholders, including people of concern, staff, implementing partners, contractors and related Third Parties, authorities and public officials, have safe, easy and trusted access to report suspected corruption in confidence.
- DRC will help relevant stakeholders to avoid corruption as an element of its aim to build and support the capacity of communities, civil society and governments.



## Reporting and Investigations

- DRC is committed to taking all reported suspicions of corruption seriously and assessing, acting upon, investigating and disciplining all such cases as appropriate and according to professional, transparent and fair procedures.
- DRC is committed to protecting reporting persons' confidentiality and rights, and does not tolerate retaliation against reporting persons.
- DRC considers knowingly making a false report of corruption to constitute a violation of this policy. Doing so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with DRC.
- DRC will seek to recover any assets lost due to corruption.
- DRC is committed to meeting its obligations to report instances of corruption to relevant donors and to external authorities as appropriate.

## Compliance and Corruption Risk Management

- DRC is committed to knowing and understanding the Anti-Corruption laws and regulations applicable to its projects and the areas in which it operates. DRC and its staff will comply with the laws of the countries in which they are located as well as the rules and regulations of its donors and applicable international Anti-Corruption legislation and conventions. When local law sets lower standards than the DRC Anti-Corruption Policy, Code of Conduct or administrative procedures, then these internal procedures are to be used to the extent that they do not directly conflict with local law.
- DRC will learn from corruption cases, take corrective action and adjust our culture and practices accordingly in order to better prevent future cases and ensure compliance.
- DRC management will review DRC's Anti-Corruption Programme implementation annually with respect to legal and regulatory developments and to ensure compliance and best practice.
- DRC is committed to preventing corruption by systematically assessing and reviewing corruption risks in its work according to its robust Risk Management Framework. DRC can thereby design its interventions and mitigating measures according to these risks, also as they may relate to external parties, such as implementing partners, contractors and related Third Parties.