



## **Anti-corruption and anti-bribery policy**

*Approved by the Board 2015-03-10*

### **Definition**

Swedwatch uses Transparency International's definition of corruption according to which corruption is the abuse of entrusted power for private gain.<sup>1</sup>

### **Purpose**

Swedwatch denounces all forms of corruption, a stance that shall be reflected in the conduct and actions of all employees and elected representatives. Elected representatives and employees of Swedwatch are committed to a zero-tolerance policy on bribery and corruption, recognising that bribery is contrary to fundamental values of integrity, transparency and accountability, and undermines organisational effectiveness. Swedwatch is responsible for assuring that adequate procedures are in place to prevent bribery.

### **Scope**

All employees, elected representatives and consultants contracted by Swedwatch are bound to follow the policy, which should be added as appendix to contracts.

### **Policy requirements**

- Elected representatives, employees and consultants shall not exploit their position at Swedwatch for their own or a third party's gain in their relations with employees, partner organisations or other individuals/groups.
- Elected representatives, employees and consultants shall not participate in decision-making nor prepare decisions in cases where his/hers impartiality can be challenged.
- It is prohibited to, receive or allow to be promised, request or submit, promise or offer bribes or other improper rewards, recompense, compensation, improper gain or advantage of some form that may constitute illegal or improper behaviour. Benefits without financial value are also covered by this policy.
- Elected representatives, employees and consultants are expected to be cautious when being offered gifts from colleagues, partners, companies, public authorities or other individuals or groups. It is prohibited to accept gifts unless of insignificant value<sup>2</sup> and an appropriately modest expression of appreciation. Swedwatch's employees, elected representatives and consultants should not let themselves be invited to lunch or dinner by companies, public

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<sup>1</sup> [http://www.transparency.org/whoweare/organisation/faqs\\_on\\_corruption/2/](http://www.transparency.org/whoweare/organisation/faqs_on_corruption/2/)

<sup>2</sup> Max 500 SEK.



authorities or parties from whom Swedwatch may get an assignment. Exceptions can be made if lunch or dinner is provided as part of a seminar or similar event and offered to all participants. Any gifts received should not be viewed as personal but rather belonging to the office.

- Elected representatives and employees shall not commit the organisation, financially or otherwise, unless such action falls within the scope of their decision-making powers.
- Employees shall handle funds and material to which they are entrusted with care, and shall be prepared to account for such funds or material, in full, at any given time.

### **How to report corruption**

Any suspicions of corruption should be reported immediately to the Director of the organisation. In case the suspicion concerns the Director, it should be reported directly to the Board of the organisation. When corruption is suspected to exist in relation to projects financed by Sida, Sida will be informed immediately. Actions to stop corruption must also be taken immediately and an investigation will be initiated. When relevant this will be reported to the police. Sanctions may be imposed against a person suspected to be involved in corruption, according to existing laws.

The anticorruption and bribery policy of the organisation will be revised by the board of Swedwatch and the lay auditor on an annual basis.