



## Anti-Corruption Policy

# INTERNATIONAL POLLUTANTS ELIMINATION NETWORK (IPEN)

Approved: 14<sup>TH</sup> OF DECEMBER 2016

By: IPEN EXECUTIVE COMMITTEE (2016 DECEMBER MEETING)

### 1. Scope

IPEN as a global civil society network is dedicated to promoting the public interest toward a toxics-free future and pledges to carry out its mission in a responsible, truthful, and ethical manner. This policy should support all IPEN stakeholders to operate with a high level of professional and organizational integrity.

This policy applies to all activities and processes associated with the normal operations of IPEN and for any activities taking place in the name of IPEN or being funded by IPEN. All IPEN staff members, consultants, Executive Committee (EC) and Steering Committee (SC) members, regional hubs, and Participating Organizations (PO) to which IPEN sub-grant funds are obliged to follow this policy.

The responsibility to work against corruption and ensure that funds handled by IPEN are used for its designated purpose lies with all IPEN stakeholders. Any breaches of this policy should be reported to IPEN through the whistleblower mechanism, as described below.

### 2. Definitions

- **Bribery** is the act of offering money, services or other valuables to someone to persuade them to do something in return.
- **Conflict of Interest** arises from situations where an employee, consultant, Executive Committee, or Steering Committee member has a private interest that could influence their professional performance.
- **Extortion or abuse of power** is when someone uses their professional status for private gain.
- **Fraud** is an economic crime involving false pretenses by someone who gains financial or other advantages unlawfully.
- **Nepotism** is providing favors to relatives and friends based on that relationship rather than the skills and suitability of that person.
- **Gifts** are defined as services, travel, entertainment, material goods, or favors.

### 3. Anti-Corruption Principles

Corruption can have many faces, from offering money or services to hastening decision making. IPEN explicitly prohibits any corrupt practices such as bribes, extortions, nepotism, and illegal payments in our operations, and we abide by and uphold anti-corruption laws in the countries in which we operate. Specifically, IPEN will respond promptly and professionally to evidence of mismanagement and corruption at all levels of the organization and decisively act in adherence to due process.

We commit to the following principles:

- We will avoid potential or actual Conflicts of Interest between our personal interests and the interests of IPEN. If we are aware of a potential Conflict of Interest, we will openly report it and be ready to step aside in any related decision process.
- We will not use extortion or try to influence any person or institution for our personal purpose and gain by using IPEN or our position at IPEN, with external parties, or with other IPEN stakeholders.
- We consider fraud as illegal activities that must not be used as a method within IPEN or with any other stakeholders
- We will neither give nor accept bribery in any form.
- We will avoid nepotism in any form and openly report on any friend, family, or personal relations which could create a Conflict of Interest.
- We will not receive any gifts that would harm or influence our independent performance of IPEN work, nor accept any gifts that include an expectation on a specific action in return. Only smaller hospitality gifts are accepted.

### 4. Functions and Responsibilities

The Executive Committee shall be responsible for administering this policy and for adopting procedures to enforce this policy. It is the responsibility of the IPEN Secretariat to inform all Participating Organizations and Regional Hubs about this policy. All IPEN staff members are obliged to sign a Code of Conduct to ensure their commitment to this policy. EC and SC members should sign a Code of Conduct including a Conflict-of-Interest statement. All consultant and sub-grant contracts include an anti-corruption clause to ensure commitment to this policy.

### 5. Reporting and Processing on Suspected Corruption Cases

If evidence is linked to IPEN activities on governance or top management level (i.e. EC, SC, International Coordinator or Operations and Finance Director (OFD)), the complaint should be sent to the **IPEN Former Co-Chair Committee (ipen-fcc@ipen.org)**, who holds the overall responsibility for the process and for compliance to the principles of this policy. The IPEN Former Co-Chair Committee may designate a lead investigator for a complaint.

If the suspicion is linked to IPEN activities on an operational level (i.e. Secretariat staff, consultants or POs), the complaint can also be sent to the OFD (**mariajohansson@ipen.org**), who in such cases holds

the overall responsibility for the process and for compliance to the principles of this policy. The OFD is responsible for leading or designating an investigation if needed.

When reporting on a suspected corrupt activity, the whistleblower will be asked to report through a Report Submission Form (Annex 1) on:

- Who was involved (persons or institutions)?
- What has happened?
- Does this offense relate to IPEN's funding?
- When did it happen (project, country, organization)?
- How did you find out about the offense?
- Who else might have information on the offense?
- Who else knows about this report being submitted?
- Is there any supporting documentation at hand to support the investigation?
- Can IPEN contact the whistleblower for further information during the investigation?

The process will be led and organized by the responsible person or body as indicated above. The process may be adjusted based on the specific situation, documentation, and people involved. All processes should be defined around the following principles:

- The complaint will be handled with confidentiality and will only be assessed by those people needed to investigate the complaint. It is the responsibility of the investigator (i.e. Former Co-Chair Committee or OFD) to decide who needs to be involved in the specific process.
- The investigation should focus on testing the reported evidence and gathering proof and documentation on the situation and actions reported.
- The investigation should result in a written report.
- The investigation should start without delay upon receiving the report.
- Complaints can be made anonymously, acknowledging however that anonymous reports could be more difficult to investigate.
- At all times, the whistleblower will be protected from harassment or negative effects from reporting their suspicion.
- The investigator should handle the complaint with the greatest respect for the whistleblower and a welcoming approach to those stepping forward to report on any suspected corruption case.
- The investigator should do its utmost to avoid revealing the identity of the whistleblower to others.

The investigator responsible should start an investigation of the complaint by gathering further information and interviewing people who could have further information. After the initial investigation has been made, the person or group accused will be asked to provide a defense against the complaint. Thereafter, an investigation report should summarize the results and suggest corrective action. The report will be presented to the Former Co-Chairs Committee and thereafter provided to the

governance level above the one investigated for decision, i.e., the EC and SC will manage decisions related to the Secretariat, while the General Assembly will receive reports related to the EC and the SC.

Those accused will be given the right of appeal and the right to provide evidence countering the complaint of corruption, while the whistleblower's identity will remain confidential. Appeals should be made to the Former Co-Chairs Committee. If the appeal includes new evidence or information, the Former Co-Chairs Committee should reopen the investigation based on the new information or evidence and resume the process according to the principles outlined in this policy.

Based on the nature of the complaint and the results of the investigation, IPEN can implement disciplinary actions, such as disciplinary notes or dismissal of staff, or requesting an organization repay funds provided by IPEN.

The decision on disciplinary actions on an operational level will be taken by the International Coordinator in consultation with Co-Chairs. For the governance or top management level, the decision will be taken by the governance level above the one investigated, i.e. the EC and SC will take decisions related to the Secretariat management, while the General Assembly will take decisions related to the EC and SC, based on advice from the former Co-chairs of IPEN.

## Annex 1: Corruption Submission Report

Please fill in this report if you have seen or been notified about any suspicious actions within the IPEN governance, IPEN secretariat, or in the use of IPEN funds handled by an IPEN Participating Organization.

**Please provide us with input on the following questions:**

- Who was involved in the suspected corruption (persons or institutions)
- What has happened?
- Does this offence relate to IPEN's funding?
- When did it happen (project, country, organization)?
- How did you find out about the offence?
- Who else might have information on the offence?
- Who else knows about this report being submitted?
- Is there any supporting documentation at hand to support the investigation?
- Can IPEN contact you for further information during the investigation?

Please send your report to **IPEN's Former Co-Chairs Committee ([ipen-fcc@ipen.org](mailto:ipen-fcc@ipen.org))**, the body in charge of handling this process. For reports on an operational level (i.e., related to sub-grants to POs or staff of the Secretariat), you can also send your report to IPEN's Operations and Finance Director ([mariajohansson@ipen.org](mailto:mariajohansson@ipen.org)).

You can provide your report anonymously, but please be aware that it might make the investigation process more difficult.

IPEN will handle this report according to the following principles:

- The complaint will be handled with confidentiality and is only to be assessed by those persons absolutely needed to investigate the complaint.
- The investigation should start without delay upon receiving the report.
- At all times, the whistleblower will be protected from harassment or negative effects from reporting their suspicion. To the extent possible, IPEN will avoid revealing the identity of the whistleblower to others.