

Anti-Corruption Policy of IBON
Approved by the Board of Trustees, April 27, 2017

IBON strictly prohibits any form of corruption and fraud or even the appearance of corruption and fraud. The integrity and reputation of the organization is of high importance. All concerned are expected to be extremely cautious and to scrupulously avoid the misuse of the organization's resources, status or authority for personal gain or for any other purpose inconsistent with the values the organization upholds.

IBON begins from the premise that its board, management and staff uphold the organization's ethical principles and policies. The organization correspondingly gives high premium to corresponding trust and confidence in them and does not primarily rely on excessively bureaucratic policies, procedures and controls aimed at strictly monitoring behaviour. The organization however does not condone corruption and this anti-corruption policy is drawn up with the intent of upholding the integrity and reputation of IBON and of the people's movement which it is a part of.

We are correspondingly guided by the following:

1. **Scope.** These guidelines cover IBON as an organization and those working for the organization as well as all those who represent or otherwise have working relationships with other parties on behalf of the organization. Individuals covered thus include Board members, staff, consultants and others hired on a contractual or freelance basis. Working relationships covered include transactions with the organization's wide range of partners, contractors, suppliers, and public officials. These guidelines are moreover considered a key reference for all those in full-time, contractual, freelance and other work agreements with the organization and their violation can initiate the termination of contracts and other working relationships.
2. **Definition of corruption and fraud.** Corruption includes the actual misuse of resources and granting or accepting of undue advantage as well as all related or predicate acts including but not restricted to falsification of documents, concealment and other deceit. This also includes offering, giving, requesting or accepting gifts, rewards, commissions, loans or any other like benefit as an incentive to do something dishonest, illegal or a breach of trust. IBON moreover avoids entering into any financial, business or other relationships that may reasonably be seen as giving rise to a conflict of interest (See Annex 1). Fraud includes the misappropriation of the organization's resources whether directly or through intentional material misrepresentation.
3. **Prohibiting corruption and fraud.** IBON commits to avoid and prohibit corrupt and fraudulent acts including but not restricted to the following, whether performed directly or indirectly and with private or public parties:
 - a. Paying or accepting bribes or other incentives, whether in financial or non-financial form, with the aim of ensuring, facilitating or accelerating a transaction.
 - b. Offering or accepting extravagant gifts, entertainment or reimbursement of expenses beyond the reasonable bounds of normal working relationships.
 - c. Theft of cash, securities, publications, merchandise, supplies, equipment or other assets.
 - d. Malicious submission of fictitious or inflated expenses for reimbursement or for payment.
 - e. Malicious misclassification or misrepresentation of revenues, expenses and other data in financial documents whether internal or for regulatory submissions. This includes but is not restricted to forgery or alteration of any check, bank draft, statement, billing, record, form, report, return or other financial document.
 - a. Unauthorized use of staff, equipment, facilities, property, credit cards, bank accounts and any other resources for purposes unrelated to the organization's normal work.

- a. Intentional failure to disclose material related party transactions.
 - b. Any other reasonably similar abuses as may be identified.
4. **General points and procedures.** IBON commits to the following:
- a. Ensure awareness of these guidelines against corruption and fraud and encourage staff to report offences and concerns as early as possible. In this regard:
 - i. Incidents shall be reported to the Executive Director (ED) who shall convene the Executive Committee (EC) as soon as necessary corresponding to the gravity of the possible offense. If the incident involves any member of the EC, the matter may be raised with any member of the Board and preferably the Chairperson or Vice-chairperson. The report shall preferably be done in writing.
 - ii. The ED and/or the Board Chairperson/Vice-chairperson shall investigate the incident as soon as necessary corresponding to the gravity of the possible offense. The timeliness of the investigation shall give due consideration to the seriousness of the allegation.
 - iii. Confirmed violations will be dealt with through appropriate disciplinary and/or contractual sanctions. Actions taken against perpetrators will be determined in consultation with legal counsel and, in any case, will still respect the rights of the perpetrator.
 - b. Make it clear to all that:
 - i. They will not suffer any disadvantage from refusing to pay or accept bribes.
 - ii. Those reporting suspected violations will be assured of anonymity if requested. Every effort will be made to keep the reporting party's identity confidential, consistent with the need to conduct an adequate and fair investigation.
 - iii. Allegations will not be discussed with anyone other than those who have a legitimate need to know. The rights of the person/s accused will be protected so as not to damage their reputation especially should they be found innocent.
 - iv. Reporting in good faith will not suffer any harassment, retaliation or other adverse consequences. on the other hand, malicious or knowingly false allegations will be subject to corresponding disciplinary sanctions.
 - v. Any Board or staff who harasses or retaliates against a party reporting in good faith is subject to corresponding disciplinary sanctions.
 - c. Ensure that organizational systems, policies and procedures are supportive of or otherwise compliant with these guidelines with appropriate controls. This includes but is not restricted to financial matters such as procurement practices.

ANNEX 1: CONFLICT OF INTEREST

IBON seeks the fairness in decision-making that is more likely to occur in an impartial environment. Conflicts of interest and related-party transactions are among the forms of subjective activity that can result in improper results.

Conflict of interest arises when a person with responsibility to promote IBON's best interest at the same time has, directly or indirectly, a personal competing interest. This conflict is realized if the personal competing interest is exercised over a fiduciary interest. Conflicts of interest or the appearance thereof should be avoided.

Some examples conflict of interest include but are not restricted to the following situations in which a Board member or staff of the organization:

1. Receives a personal gift or other incentive – whether directly or indirectly, financial or non-financial, and immediately or with a promise thereof – from a purchaser, lessor or vendor that the organization will be transacting a good or service with.
2. Approves or authorizes the organization to provide financial or other assistance to persons related to the Board member or staff beyond the reasonable bounds of normal assistance.
3. Uses the organization's staff, equipment, facilities, property, credit cards, bank accounts and any other resources for personal benefit.

Related-party transactions refer to transactions between two or more parties that have interlinking relationships. IBON acknowledges that some related-party transactions are clearly to the advantage of the organization and its programs and are justifiable – other related-party transactions are however conflicts of interest and should be avoided.

Related-party transactions and the nature of the relationships involved need to be known by the Executive Committee and, when warranted by the size of the transaction, to the Board. Substantial transactions with related parties on may be undertaken subject to:

1. Ensuring competitive bids or comparable valuations.
2. Related parties being excluded from the discussion and approval of related-party transactions.
3. IBON's Board or EC, as deemed appropriate, approving the transaction as in the best interest of the institution.
4. Audited financial statements fully disclosing material related-party transactions.