

Anti-Corruption and Fraud Policy

Brief & purpose

In accordance with its Code of Conduct as well as its Financial Policy, the EJ-YMCA is committed to actively fight corruption in all of its areas of activity. The EJ-YMCA does not tolerate any form of corruption, bribery, fraud, or embezzlement. Therefore, this policy together with the Code of Conduct and the Financial Policy, provide guidance to all staff and volunteers to run operations in an ethical and legal manner, and helps them recognize and avoid any corrupt practices while conducting the EJ-YMCA's operations.

The purpose of this policy is to develop an organizational culture of compliance, ethics and honesty. It conveys to all EJ-YMCA staff and volunteers as well as partners and beneficiaries, an unambiguous message of opposition to corruption in all of its forms, and the EJ-YMCA's willingness to eradicate them in all of its activities.

Scope

This policy is binding to all EJ-YMCA staff and volunteers who are involved in any of its activities.

Policy elements

1. Conflict of interest

Conflict of interest may occur whenever a staff member's interest in a particular subject may lead them to actions, activities or relationships that undermine the EJ-YMCA and may place it to disadvantage.

When a staff member understands or suspects that a conflict of interest exists, they should bring this matter to the attention of management so corrective actions may be taken. Supervisors must also keep an eye on potential conflict of interests of their subordinates.



- The responsibility of resolving a conflict of interest starts from the immediate supervisor and may reach senior management which has the responsibility of the final decision when a solution cannot be found.
- Declare any known or potential financial, personal, family or close relationship interest in any matters of official business that may impact the work of the EJ-YMCA (i.e contracts, recruitment, beneficiary groups).
- Never use position at the EJ-YMCA, or use connections obtained through the EJ-YMCA to personal advantage.
- Never use the EJ-YMCA's equipment or means to support an external activity.
- Never accept another employment or consultancy work outside the EJ-YMCA without approval by the EJ-YMCA management to ensure there is no conflict of interest.
- Seek permission before agreeing to be nominated to take official role at the government, or any political party, or be a member at any organization's Board of Directors.

2. Briberies, Gifts and Hospitalities

- The EJ-YMCA discourages staff and volunteers from accepting gifts from suppliers, partners,
 or beneficiaries ... as a result of their employment at the EJ-YMCA.
- Any gift received as a result of being employed at the EJ-YMCA, regardless to its value, must be declared to the HR Department promptly where it shall be registered.
- Any staff member who receives hospitality as a result of being employed at the EJ-YMCA must inform the direct Supervisor.
- Any staff member who provides gifts or hospitality to a stakeholder of the EJ-YMCA must inform the direct Supervisor. Reimbursement applications for gifts and hospitality shall always be supported by written approval of the direct supervisor and by valid invoices.
- The EJ-YMCA prohibits briberies for the benefit of any external or internal party.
- Staff and volunteers must never abuse their position at the EJ-YMCA by requesting any favor or service to benefit oneself, family member or a friend in return to assistance offered by the EJ-YMCA.



3. Allowances

- It is forbidden that staff receive allowances for conducting trainings, or participating in workshops, etc ... if this activity is similar to the services offered through the EJ-YMCA, and part of the staff job duties. Collected allowances should be returned to the EJ-YMCA. In cases where certain staff put extra effort to get this activity done, then they could be legible for financial reimbursement conditional to the formal approval of the Director and the General Secretary.
- Based on the terms of the contract signed between the EJ-YMCA and its staff, one cannot be contracted by a third party to conduct a training or participate in a workshop, etc. at a personal level, prior to formal approval by the Direct Supervisor, and under the condition that the contracting authority has not been a partner or donor to the EJ-YMCA within the last seven years. In cases where the contracting party is a partner or donor to the EJ-YMCA, then the contract can only be issued to the EJ-YMCA and requires the steps described earlier.
- Any staff who participates in a training program or a workshop abroad, must receive support to cover the expenses of travel, transportation, accommodation and hospitality relevant to the mission, in addition to the per diem, based on the EJ-YMCA's internal policy for reimbursing staff in a mission abroad. If the host organization provides honorariums for the EJ-YMCA staff participation, then this is considered income accrued to the EJ-YMCA.

4. Nepotism and favoritism

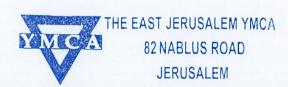
- All EJ-YMCA staff and volunteers are expected to behave professionally, so as to keep relationships among them appropriate and harmonious.
- Staff who work together may naturally form friendships either in or outside of the workplace. The EJ-YMCA encourages this relationship between peers, as it can help them communicate and collaborate. But, it is expected that they focus on their work and keep personal disputes outside of the workplace.
- If a staff member or volunteer is in an intimate relationship with a colleague, it is expected that they maintain professionalism and keep personal discussions outside of the workplace.



- The same project being funded by two different donors.
- Resources given to ghost beneficiaries who do not really exist.
- Misleading partners and donors by submitting inaccurate or fake information and reports.

6. Concerns and Breaches:

- All EJ-YMCA staff and volunteers, as well as partners and beneficiaries, may contact the EJ-YMCA HR Department to solve any questions of doubts about this Policy.
- Any concerns or doubts that cannot be solved at the HR Department level, or are directly related to the Senior Management Team conduct, must be raised to the General Secretary to solve.
- Those who have any reasonable indications or suspicion of any act in violation of the rules set out in this Policy, must raise the issue to their line supervisors. The EJ-YMCA staff and volunteers will not be subject to retaliation for good-faith reporting of suspected breaches of the Policy or for cooperation under this Policy.
- Failure to comply with this Policy will result in appropriate disciplinary action based on the measures set in the Human Resources Manual, which, depending on the circumstances, may include termination of employment or of the relationship.



This Policy was endorsed by the Board of Directors in January 2021

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