



ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Bribery and corruption are found in all countries. They hurt the disadvantaged disproportionately; diverting resources intended for development and environment and contribute to increasing the costs of basic public services. They undermine economic growth and are a barrier to sustainable development, poverty alleviation and good governance.

The CAA policy is based on best practice guidance which strongly encourages NGOs to put in place policies and procedures that are robust and proportionate to their size, complexity and the range of risks that they face.

1. Zero Tolerance of Corruption

CAA's Anti-Corruption Policy is based upon a zero-tolerance approach to corruption. Zero-tolerance means that CAA 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 CAA.

It means that CAA 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 CAA. CAA 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.

2. Definitions

For clarity, CAA adopts the definition of bribery and corruption provided by Transparency International in their NGO Guidance:

Bribery:

The offering, promising, giving, accepting or soliciting of money, a gift or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

Corruption:

Corruption is the misuse of entrusted power for private gain

3. Upholding CAA's Values and Integrity

At CAA, 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 CAA. We follow an approach to our work grounded in principles of neutrality, impartiality and independence.

4. Safeguarding CAA's Entrusted Means

CAA 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. CAA has an obligation towards these donors to ensure that these means, and CAA activities are not subject to corruption. All staff, as well as all others working with CAA assets, therefore have a responsibility to ensure that corruption is prevented in CAA activities.

5. Anti-Corruption Culture and Practices

CAA 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 comply will result in disciplinary action up to and including the possibility of termination of employment.

CAA and staff are committed to staying accountable and transparent, to upholding CAA's values and integrity, to following formal procedures, and to safeguarding CAA'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 CAA management.

CAA 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 CAA; and 3) how to do so. (see section on reporting)

CAA is committed to using transparent, straightforward and clear procedures, monitoring, checks and balances and documentation in order to avoid corruption in our work.

CAA 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 CAA'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 CAA stakeholders. Any gift(s) constituting an attempt to exert an undue influence on any CAA staff or stakeholder are strictly prohibited. Staff involved in partner and beneficiary selection will exert enhanced caution in this regard.

CAA strictly prohibits the promising, offering, giving, seeking or accepting of representation, hospitality and gifts for staff involved in the procurement process.

CAA 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 CAA.

6. Compliance and Corruption Risk Management

CAA is committed to knowing and understanding the Anti-Corruption laws and regulations applicable to its projects and the areas in which it operates. CAA 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 anti-Corruption legislation and guidance.

CAA will learn from relevant corruption cases including of other NGO's and adjust our culture and practices accordingly.

CAA management will review CAA's Anti-Corruption Programme implementation annually with respect to legal and regulatory developments and to ensure compliance and best practice.

CAA is committed to preventing corruption by systematically assessing and reviewing corruption risks in its work and design its interventions and mitigating measures according to these risks, also as they may relate to external parties, such as implementing partners, contractors and other related Third Parties.

7. Reporting/investigations

CAA is committed to meeting its obligations to report instances of corruption to relevant donors and to external authorities as appropriate and applicable to legal jurisdiction.

CAA 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.

CAA is committed to protecting reporting persons' confidentiality and rights, and does not tolerate retaliation against reporting persons.

CAA 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 CAA.

Instances of actual or potential bribery will be properly and promptly investigated. The objectives of an investigation will be to:

- Confirm whether or not a bribe and/or corruption has taken place;
- Determine the appropriate subsequent action, depending on the findings of the investigation. This may include disciplinary procedures and external reporting (eg. to the authorities).

CAA staff who feel that they have been subject to or witnessed corruption/bribery can report this by following the CAA procedures for corruption and bribery.