

## Wetlands International Anti-Corruption Policy

### o. Introduction

This policy sets out Wetlands International's commitment to the prevention and detection of corruption. This policy applies to Wetlands International as an organisation and to all persons that work in, for, or on behalf of Wetlands International.

The objective of this policy is to provide an overview of integrity issues, the preventive measures to be taken, signals of corruption, research to be executed and the appropriate reaction. Proper attention to managing integrity risks and corruption may divert financial loss, reputation loss and ultimately may increase the possibility for fundraising.

It is intended that this Anti-Corruption policy be a reference document for Wetlands International staff members in general and Wetlands International managers in particular on how to avoid and handle corruption related issues. Furthermore, it will be a tool to build awareness of the challenges related to corruption.

### 1. Definition of corruption

Wetlands International defines corruption as:

**the abuse of entrusted power for illegitimate individual or group benefit**

Corruption can involve both financial and non-financial benefits such as enhanced personal reputation, the acquiring of political capital or access to services. Corruption might occur in many forms, including but not limited to:

- *bribery*: when someone improperly provides goods or services against some form of improper compensation
- *embezzlement*: theft of resources for own use
- *extortion*: the act of obtaining something by force, threats or undue demands
- *favouritism*: the unfair favouring of one person or a group at the expense of others and includes nepotism which is favouritism shown to relatives

### 2. Wetlands International does not tolerate corruption

Wetlands International does not tolerate any type of corruption as defined in section 1.

Corruption poses a serious development challenge. It undermines democracy and good governance by subverting formal processes. It also weakens economic development by generating considerable distortions and inefficiency. Corruption especially hurts the poor by denying them free and fair access to the services that they are entitled to.

To prevent abuse of entrusted power for private gain and guarantee that donors' money is well spent, Wetlands International is committed to fight all types of corruption. Wetlands International lives up to this commitment by:

- holding employees and counterparts accountable for reporting suspected cases of corruption, and providing them with suitable channels of communication and ensuring sensitive information is treated appropriately (see section 3 & 4)
- rigorously investigating instances of alleged corruption and taking firm and vigorous action against any employee or counterpart involved in corruption
- maintaining and enforcing additional policies and procedures for countering corruption

### 3. Reporting suspicion of corruption

All stakeholders, including all persons that work in, for, or on behalf of Wetlands International can approach Wetlands International with their grievances or complaints related to possible cases of fraud or corruption. Wetlands International commits to investigating and retaliating suspected cases of corruption. In addition to the specific responsibilities listed below, all employees should also adhere to Wetlands International's Code of Conduct, which provides guidance on our core values and guiding principles and commitment to transparency and accountability.

#### *Employee's responsibilities*

All employees and volunteers of Wetlands International are responsible for:

- acting with propriety in the use of Wetlands International's assets and resources
  - alerting their line manager:
    - to any suspected or actual fraud or corruption
    - to any suspicious act or event which might give rise to a suspicion of fraud or corruption
- If for any reason a member of staff does not feel able to report a suspected fraud or corruption to their line manager, he/she should inform a more senior manager or the Chief Operations Officer (COO) of Wetlands International. Wetlands International staff may anonymously report corruption in the suggestion box. Staff should refer to the Whistle Blowing Policy (see section 4) for guidance where they do not feel able to report suspected fraud or corruption to line management, or are not satisfied that their concerns have been addressed;
- assisting in any investigations by making available all relevant information and by cooperating in interviews.

#### *Subcontractor/ partner responsibilities*

Subcontractor or partner organisations' obligations are detailed in Wetlands International's Financial Control and Sanctions Policy for Contracting Out and Grant agreements and contracts. Subcontractor or partner organisations should report any suspected fraud or corruption.

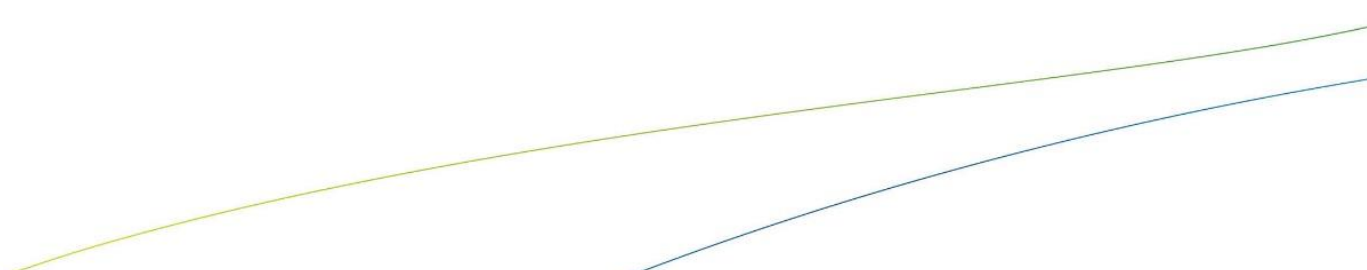
In addition Wetlands International's Complaints Procedure outlines the protocol and procedures for actions to be taken on receiving complaints, including information about or when suspecting the possibility of unlawful expenditures by subcontractors/ partner organisations of Wetlands International. This procedure also describes how Wetlands International processes complaints including the recording of complaints in a register.

Cases of serious fraud will be reported to the appropriate authorities in accordance with applicable law.

### 4. Whistleblower policy

A whistleblower is someone notifying his or her surroundings (normally a line manager) about potential corruption taking place. All staff members must be encouraged to become whistle blowers if they detect possible corruption issues. The internal reporting of abuse is seen as a contribution to improving the functioning of Wetlands International and the desired transparency and accountability. Employees who in good faith report an abuse must be protected against unfair treatment. The whistleblowers can be pressured from the potential corrupt staff member or supporters. To reduce this risk, staff members can "blow the whistle" anonymously, supported by the principle that the whistleblower is a witness, not a complainant. A system with a suggestion box is a suitable tool to enable staff members to report potential corruption, in complete anonymity. It can be a simple box with a lock, where written notes can be delivered. Suggestions must be handled by the management.

### 5. Concluding provisions

- a) Wetlands International shares in the responsibility for preventing and detecting corruption with the development sector and the NGO sector as a whole
  - b) Wetlands International is committed to collaboration, both within the sector and with other parties involved
  - c) In the event of undesirable conduct or other practices that violate this Anti-corruption Policy, please report this to Wetlands International's CEO or Chairperson of the Supervisory Council
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- d) If necessary and applicable, use can be made of Wetlands International's Complaints Procedure, available from its website [www.wetlands.org](http://www.wetlands.org)

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Document: Wetlands International Anti-Corruption Policy  
Author: Frank van der Valk  
Version: 0.1  
Created: 01 September 2011  
Modified: 31-3-2015 (layout)  
Available at: [wetlands.org](http://wetlands.org)  
Original language: English  
Adopted by: Management Board, 19 October 2011  
Supervisory Council, 17 November 2011

