



ANTI-CORRUPTION POLICY

ETC Foundation

ETC	Management
Date	16 July 2014
Electronic file name	ETC Anti-Corruption Policy

For Approval:

A handwritten signature in blue ink, appearing to be 'J.H.J. Dusseljee', written in a cursive style.

J.H.J. Dusseljee

Director ETC Foundation

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1 INTRODUCTION

In pursuing its vision, ETC subscribes to a number of core values including ethical entrepreneurship, zero tolerance of corruption, full compliance to legal rules and regulations in the Netherlands as well as in countries in which ETC provides its services, respect for individual freedom and attention to sustainable use of natural resources.

2 ANTI-CORRUPTION

- ETC's anti-corruption policy extends to all of ETC's operations and applies to ETC's management, employees, partners and subcontractors. The use of funds or assets for any unlawful, improper or unethical purpose is prohibited. Improper gifts, payments or offerings of anything of value to any partner or subcontractor could jeopardise ETC's reputation and development. ETC works to develop and maintain the highest standards of openness, integrity and accountability within ETC and in the way that we work with donors, partners, subcontractors or their representatives. In particular, ETC works to ensure that neither ETC as an organisation nor any staff member, partners or subcontractors are actively corrupt, or are benefiting from corrupt practices.
- ETC operationalises its anti-corruption policy through the following processes and procedures:
 - Zero-tolerance Policy
 - External Financial Audits
 - Screening of Partners' Organisational Soundness
 - Contractual Provisions and Other Measures
 - Means of Payment
 - Annual Evaluation of Subcontractors
 - Reporting Corruption / Whistleblowing
 - Application of Sanctions
 - Awareness and Training
- All ETC employees are obliged to take note of the ETC anti-corruption policy, which is an integral part of the ETC Quality Management System. At least once a year, during staff meetings, specific attention will be given to maintaining the standards of the anti-corruption policy and, if necessary, adapt it in view of demands from clients. The policy can be found on the P-drive under QMS.
- Any suspected violation of the anti-corruption policy, particularly where it concerns the conduct of an ETC employee, will be thoroughly investigated by a team under the leadership of the director or, in the event that the suspected violation refers to the director, by a team under the leadership of the chair of the Board of Trustees.
- Where there is proof of a violation of the anti-corruption policy, appropriate measures will be taken that are proportionate to the gravity of the offence committed. These could include legal action, dismissal or disciplinary actions such as warnings or penalties. The interest of the clients and the beneficiaries of the work of ETC will be taken into consideration when determining what is considered proportionate.

3 WHISTLEBLOWING

3.1 Introduction

ETC Foundation (ETC) places value on staff being able to adequately and safely report any suspicion of irregularities within organisations in which they are employed. Note that this code has not been established to enable:

- reporting of personal complaints by employees with regard to matters concerning them personally and in connection with work;
- reporting conscientious objections when carrying out ETC activities.

3.2 Internal Reporting

ETC encourages employees to report any suspicion of irregularities within the organisation. Employees should first report any suspected irregularities internally. If exceptional grounds exist, the employee may notify directly an external third party of the suspected irregularity.

An employee working for ETC shall report the suspected irregularity internally to his/her superior or, if the employee considers notifying the superior undesirable, to ETC's Counsellor (see 3.4). If the suspicion of an irregularity concerns one's superior, the employee shall notify the ETC Director.

The internal report will be subsequently processed in accordance with the procedure included in the ETC whistleblowing policy that can be found on the P-Drive under QMS.

3.3 Reporting to an external third party

An employee may report a suspicion of an irregularity to an external third party if one of the following exceptional grounds exists:

- an acute danger that necessitates external notification by virtue of a compelling and urgent public interest;
- a situation where the employee may reasonably fear that internal reporting will result in countermeasures being taken;
- a clear danger of misappropriation or destruction of evidence;
- an earlier report of essentially the same irregularity in accordance with the procedure failed to rectify the irregularity; and
- a legal obligation exists to report the suspicion of an irregularity.

The employee should notify the external third party that, taking into account the circumstances of the case, the employee reasonably believes the third party to be the most appropriate party to undo, directly or indirectly, the suspected irregularity. The employee is thereby making allowance for the effectiveness of an intervention by such a third party and for ETC's interests in minimising any damage resulting from such an intervention, insofar as such damage may not necessarily occur through action against the irregularity.

The employee's suspicion of an irregularity should be sufficiently strong given the greater level of damage that ETC is likely to incur through notification to an external third party.

3.4 ETC Counsellor

An employee may report the suspicion of an irregularity to a counsellor to obtain confidential advice. Any person who enjoys the employee's confidence and is subject to an obligation of confidentiality may act as a counsellor. Note, however, that ETC has a formal agreement with a counsellor regarding unwelcome sexual intimacies who could be consulted and who can refer elsewhere where relevant. For name and address, see Annex 15.

3.5 Legal Protection

An employee who has reported a suspicion of an irregularity while observing the provisions of this code and acting in good faith, and who does not gain personally from the irregularity or the notification thereof, shall not suffer any disadvantage to their position as a consequence of reporting. A confidential advisor shall not be disadvantaged in any way as a result of acting in such a capacity for the purposes of this code.