



# **ADRA Denmark's Anti-Corruption Policy**

April 2018 (updated March 2021)

# Anti-Corruption Policy

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**Definition** Corruption is defined as the misuse of entrusted power for private gain. It affects everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority. Corruption can take various forms such as deception/fraud, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, and collusion. Whichever form it takes, corruption is not acceptable.

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**Zero tolerance** ADRA Denmark is determined to maintain the highest standards of integrity and work ethics. We therefore maintain a policy of zero tolerance towards corruption in all its forms.

ADRA Denmark requires staff and consultants at all times to act honestly and with integrity and to safeguard the resources for which they are responsible. Corruption is an ever-present threat to these resources and hence must be a concern of all. The prevention and detection of corruption is the contractual responsibility of all employees and consultants of ADRA Denmark, and the failure to report suspicions and concerns may result in disciplinary action being taken.

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**ADRA's values** Maximum openness and transparency is essential when fighting corruption. Transparency is also one of ADRA Denmark's basic values in line with the 'T' in the PANT principles, to which ADRA Denmark adheres, and a basic pillar in our Open Information Policy. In the case of suspicion of corruption among our staff or our partners' staff, ADRA Denmark is obliged to and will immediately inform the relevant donors and the public sector, from where ADRA Denmark gets most of its funds. This will happen on our website in accordance with the Danish Public Administration Act and the Danish Act on Access to Public Administration Files.

ADRA Denmark values its reputation for financial probity and reliability. ADRA Denmark recognises that over and above any financial damage suffered, corruption may reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to corruption by:

- Instituting and maintaining cost effective measures and procedures to deter corruption.
- Taking firm and vigorous action against any individual or group perpetrating corruption against the organization, partners, and stakeholders.
- Encouraging its employees and consultants to be vigilant and to report any suspicion of corruption, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately. (See also the whistle-blowing policy)

- Rigorously investigating instances of alleged corruption and pursuing perpetrators to seek restitution of any assets fraudulently obtained and the recovery of costs.
  - Assisting the auditors, the police, and other appropriate authorities in the investigation and prosecution of those suspected of corruption.
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**Responsibility of ADRA** ADRA Denmark's management is responsible for the prevention and detection of corruption by ensuring that an adequate system of internal control exists, and these controls operate effectively. Further the management shall be available to offer advice and assistance to staff on discovered risk and control issues.

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**ADRA Partners** ADRA Denmark expects our partners to adopt the same high ethical standards including a zero tolerance towards corruption. The following clause will in harmony with Danida requirements be present in all Partnerships Agreements:

***“No offer, payment, consideration or benefit of any kind, which could be regarded as an illegal or corrupt practice, shall be made, promised, sought or accepted – neither directly nor indirectly – as an inducement or reward in relation to activities funded under this agreement, incl. tendering, award or execution of contracts. Any such practice will be grounds for the immediate cancellation of this agreement/contract and for such additional action civil and/or criminal, as may be appropriate. At the discretion of the Danish Ministry of Foreign Affairs, and other public or private donors a further consequence of any such practice can be the definite exclusion from any tendering for projects funded by the Danish Ministry of Foreign Affairs and other public or private donors.”***

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**Response** In case of suspected or detected corruption ADRA Denmark shall take the following steps as deemed necessary.

- Immediately start an investigation.
  - Attempt to solve the problem internally and without any losses to third party.
  - Secure evidence and ensure that proper actions are taken to prevent further loss.
  - Employ auditors to conduct a corruption audit in order to gauge the actual extent of the problem.
  - Notify the relevant stakeholders and authorities.
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# Anti-Corruption Code of Conduct

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All staff of ADRA Denmark will respect and promote the principles of the Code of Conduct presented below.

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## **Conflict of Interest**

***We will avoid any conflict – real or potential – between our personal interests and the interests of ADRA Denmark.***

Conflicts of interest arise from situations in which a member of staff has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of his or her official duties. Private interests include any advantage to oneself or one's family close relative, friends and persons or organisations with which one has or has had business. When faced with a potential or actual conflict of interest, staff is required to promptly inform the leadership of ADRA Denmark. Please also refer to the global ADRA International Conflict of Interest Policy (January 2016), which all ADRA employees must sign on an annual basis.

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## **Bribery**

***We will not give or accept bribery in any form.***

Bribery is the act of offering, giving, receiving, soliciting or accepting something of value with the purpose of influencing the action of an official in the performance of his/her public or legal duties. Bribery is a criminal offense in Denmark.

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## **Fraud**

***We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.***

Fraud is the use of deception with the intention of obtaining an advantage (financial or otherwise), avoiding an obligation or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behaviour, practicing trickery or acting under false pretences. Fraud is a criminal offense in Denmark.

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## **Embezzlement**

***We will not misappropriate or otherwise divert property or funds entrusted to us.***

Embezzlement is the misappropriation or other diversion of property or funds legally entrusted to someone by virtue of his or her position. Embezzlement is a criminal offense in Denmark.

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## **Gifts**

***We will not give, solicit or receive directly or indirectly any gift or other favour that may be seen to influence the exercise of our function, performance of***

***duty or judgment. This does not include conventional hospitality or minor gifts.***

In the context of corruption, a gift is a financial or other benefit, offered, given, solicited or received in the expectation of receiving a benefit in return. Gifts and hospitality may in themselves be a manifestation of corruption or may give the appearance of corruption. Gifts may include cash or assets given as presents, and political or charitable donations. Hospitality may include meals, hotels, flights, entertainment or sporting events. Generally, staff should not receive gifts or other advantages. However, in observing and respecting local hospitality conventions, small gifts may be accepted.

The following guidelines apply

- Gifts must never be given or received in secret.
- It is not allowed to give or receive money gifts.
- No gifts shall be given that are so large that the recipient will not be able to give a corresponding gift.
- No extravagant gifts must be given or received.
- Gifts must never be given in connection with bids, bid evaluation or contract negotiations.
- It is not allowed to receive gifts that are obviously intended to influence a decision.
- This includes, for example, trials or purchases of goods below the market price.

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## **Nepotism**

***We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery or other situations.***

Nepotism is favouritism shown to relatives or friends without regard to merit. Relatives or friends are treated favourably based on the close personal relationship alone rather than on a professional and objective assessment of their skills and qualifications.

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## **Reporting**

***We will report any evidence or suspicion of breach of this Code of Conduct.***

All staff are obliged to familiarize themselves with this Code of Conduct and respect its principles. They are obliged to report any evidence or suspicion of breach of the Code of Conduct to their superiors.

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## **Other Codes**

ADRA Denmark has signed up to the Code of Conduct for the International Red Cross and Non-Governmental Organizations in disaster relief, and expects its staff to live up to these standards also.

Likewise, ADRA Denmark strives to adhere to the nine Commitments in the Core Humanitarian Standard and is in the process of becoming CHS certified.

Please also refer to ADRA International's Code of Conduct and Safeguarding Code of Conduct (June 2020).

# Procedure for reporting misconduct or the suspicion thereof

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## Whistle-blowing Policy

Please refer to ADRA Denmark's Whistleblowing Policy for details on how to report misconduct.

In case of serious harm or sensitive complaints (relating to sexual misconduct, child safeguarding, or other forms of serious harm including corruption), the case should be reported as follows:

- Within 24 hours to the ADRA Denmark Secretary General (SG) who is the Safeguarding Focal Point or to one of the department directors.
- If you or the person in question are not comfortable reporting to the SG or to one of the department directors, within 24 hours you can either:
  - report using the ADRA DK homepage: <https://www.adra.dk/make-a-complaint/>. Sensitive complaints will go directly to the Chairman of the Board / Deputy Chairman;
  - or report to the ADRA International Safeguarding Office (protection@adra.org)
  - or anonymously to [www.adventist.alertline.com/GCS/welcome](http://www.adventist.alertline.com/GCS/welcome).