

NRC's Anti-Corruption Policy

NRC is committed to high ethical standards and transparency in all our work and to remain accountable to all internal and external stakeholders, including beneficiaries, donors, employees, volunteers, deployees, management, partners, contractors, suppliers and NRC's Board of Directors.

NRC's position on Anti-Corruption

- NRC defines corruption as: **the abuse of power for illegitimate individual or group benefits.** This involves both financial and non-financial benefits.
- NRC takes a firm position against corruption in any form, and actively works to prevent, avoid and detect all forms of corruption through a set of compliance procedures.
- NRC has zero- tolerance for all types of corruption, and acts and reacts promptly when/if corruption occurs.
- NRC employees must commit to a zero- tolerance towards corruption and Line- Managers must foster an understanding and culture where corruption is not tolerated.
- NRC employees and volunteers are not allowed to provide for, request or receive anything that can be defined as corruption according to NRC's definition of corruption.
- NRC encourages open discussions of corruption in the organisation

Duty to report misconduct

- All staff and anyone else representing NRC who becomes aware of possible corruption/breaches of the Code of Conduct committed by NRC personnel or any other humanitarian worker, partner and/or third parties doing business with NRC, must report alleged violations immediately through one of the three whistle blowing channels:
 1. Through Line Manager or any senior NRC manager
 2. Through appointed focal points or staff representatives
 3. Through the HR Manager/adviser in the country office, regional office or HR adviser in HO¹

NRC's documents and procedures related to Anti-Corruption

NRC is subject to and will act in accordance with all applicable professional, ethical and legal requirements established by Norwegian law and the relevant donors' regulations and procedures.

¹ See more information on NRC's complaint and whistle blowing procedures in the *Explanatory notes to the Code of Conduct*

An Anti-Corruption Handbook has been developed to guide the implementation of the Policy. The Handbook will assist managers and staff to better understand the overall threats and how to apply correct control measures throughout the organisation. **NRC's Anti-Corruption Handbook** highlights:

- NRC's different documents and procedures related to anti-corruption
- Which anti-corruption measures NRC Line Managers and staff must in particular watch out for
- How to handle corruption cases if they occur

The Anti-Corruption Handbook is compulsory reading for Line Managers and support staff.

All Line Managers in NRC have the responsibility to ensure that the procedures and regulations outlined in NRC's policy, handbooks and other documents related to Anti-Corruption are followed within their respective areas of responsibility.

An Anti-Corruption and Investigation Adviser position established at the Head Office is the global focal point for NRC's anti-corruption work and investigation of (alleged) cases of corruption. The Anti-Corruption and Investigation Adviser must be informed as early as possible about all probable corruption cases within the organisation and will coordinate information given to our donors.

The following documents include regulations and procedures related to Anti-Corruption:

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| - NRC's Code of Conduct |
| - <i>NRC's Explanatory notes to the Code of Conduct, with its accompanying:</i> |
| ○ whistle blowing/complaint mechanisms |
| ○ Guidelines against sexual exploitation and abuse |
| ○ Investigation routines |
| ○ Disciplinary measures |
| - NRC's Anti-Corruption Handbook |
| - NRC's Financial Handbook |
| - NRC's Logistic Handbook |
| - NRC's HR guidelines |
| - NRC's Counter Terrorism policy |
| - NRC's Security Instructions |
| - NRC's Monitoring & Evaluation and Risk Management Systems |
| - Internal and External Audits |
| - Donor Agreements |