Norwegian Afghanistan Committee

PROVISIONAL

ANTI-CORRUPTION POLICY 2018

"The duty of youth is to challenge corruption."

Kurt Cobain

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COMMITMENT

The Norwegian Afghanistan Committee (NAC) is firmly committed to the highest ethical standards. NAC is committed to combat corruption and to be transparent in all programs and operations both in Afghanistan and Norway and to be accountable to all internal and external stakeholders, including beneficiaries, partners, donors, volunteers, interns, employees, management, officers and Board of Directors, and to expect the same ethics, transparency and accountability in return from our beneficiaries, partners, donors, volunteers, interns, employees, management, officers and Board of Directors.

DEFINITION OF CORRUPTION[1]

The Norwegian Penal Code's main provision against corruption applies to both public and private sectors and states:

"Any person who a) for himself or other persons, requests or receives an improper advantage or accepts an offer of an improper advantage in connection with a position, office or assignment, or b) gives or offers anyone an improper advantage in connection with a position, office or assignment, shall be liable to a penalty for corruption."

Compliance to corruption is also punishable in the same manner. It should also be emphasized if the act is committed by - or against - a public official, or any other person whom in breach of the special confidence that comes with his position, office or commission, whether it has provided significant economic benefit, whether there was a risk of significant harm economic or otherwise, or if it's false accounting information, prepared false accounting documents or false statements.

It is important to note that trafficking of influence is also included and that someone may be punished if for themselves, or others, they receive or accept an offer of an undue advantage for influencing the conduct of a position, office or assignment, or give or offer anyone an improper

[1] Norad (2013) / last updated in 2015. Ref: https://www.norad.no/en/front/thematic-areas/democracy-and-good-governance/combating-corruption/ [10.03.2018]

advantage to influence performance of a position, office or assignment. Position, office or assignment includes job duties or assignments abroad.

NAC'S POSITION ON CORRUPTION

- NAC defines corruption as the abuse of entrusted power for personal or organizational gain;
- NAC has zero tolerance for all forms of corruption and nepotism;
- NAC integrates its ethics and values into its everyday work;
- NAC management and staff are jointly responsible for anti-corruption;
- NAC management and staff will be transparent and seek guidance within the NAC and outside the organization when in doubt;
- NAC prohibits any form of corruption and nepotism, both within the organization, towards donors and partners, and among beneficiaries;
- NAC officers, management, staff and volunteers must never offer, give, ask for, accept, or receive any form of bribe;
- NAC officers, management, staff and volunteers must exercise great care and wisdom in decision making and never compromise ethics when planning, implementing, monitoring and evaluating programs;
- If any NAC staff and volunteers become aware of any infringement of Afghan, Norwegian and international laws, NAC's Ethical Guidelines, NAC Finance Policy, or any other governing documents, they must inform the NAC management in line with the NAC Whistle Blower Policy:
    - Through the responsible regional or project manager and the Country Director;
    - Through the Country Director if the regional manager is involved;
    - Through the Secretary General if the Country Director fails to act or if he/she is involved;
    - Through the Chair of the Board if both the Secretary General and the Country Director fail to act or themselves are involved;
    - Through the Staff-Contact appointed by the Board should the Chair of the Board fail to act or if he/she is involved, or;
    - Directly through the elected female or male staff representative.
- If any NAC staff and volunteers need guidance on how to act in line with NAC policies and guidelines they should consult the NAC management in Afghanistan or in Norway;
- NAC Senior Management must foster an understanding and culture within the organization and among its partners where no form of corruption is tolerated; and
- NAC Senior Management must act and react promptly if corruption occurs.

ANTI-CORRUPTION HANDBOOK

An Anti-Corruption Handbook has been developed to guide the implementation of the NAC Provisional Anti-Corruption Policy. The NAC Anti-Corruption Handbook will guide and assist senior management and staff to better understand the overall corruption risks and vulnerabilities affecting NAC programs and operations, and how to apply correct control measures throughout the organization.

The NAC Anti-Corruption Handbook provides practical guidance on:

- The Afghanistan National Strategy on Combatting Corruption
- Norad and the Norwegian view on corruption
- Key messages – NAC's position on corruption
- The responsibilities of NAC management and staff
- The NAC Organizational Strategy
- Different forms of corruption, including:
    - Bribes
    - Facilitation payments
    - Gifts and courtesies
    - Hospitality
- How to reduce corruption risks and vulnerabilities when dealing with government authorities
- Corruption risks and vulnerabilities in relations with partners
- The economic and social impact of corruption
- How to report and speak-up against corruption

The NAC Anti-Corruption Handbook is compulsory reading for all NAC management and staff.

OTHER POLICIES & DOCUMENTS

1. NAC Ethical Guidelines & Commitments
2. NAC Financial Manual
3. NAC Procurement Thresholds
4. NAC HR & Personnel Manual
5. Other guiding documents

CONCLUDING REMARKS

From time-to-time we all may find ourselves in or experience situations where there is a risk of corruption. The Provisional NAC Policy on Anti-Corruption and the NAC Anti-Corruption Handbook provide a practical overview of NAC's values, policies, rules and regulation relating to anti-corruption, with the aim of guiding us to make the right decisions at all times, and effectively combat corruption within the NAC, and among our suppliers, partners and beneficiaries.

The Provisional Policy and the Handbook cannot provide answers to every possible situation we may face, we are therefore all strongly encouraged to seek advice when we are in doubt.

Both the Provisional Policy and Handbook will be used and tested in all NAC projects and program activities before final, edited versions should be presented to the NAC Board for their approval by end-September 2018.