



NAC ANTI-CORRUPTION POLICY



"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 programmes and operations both in Afghanistan and Norway, and to be accountable to all internal and external stakeholders, and to expect the same ethics, transparency and accountability in return from our beneficiaries, partners, donors, volunteers, interns, employees, management, Secretariat, and Board of Directors.

NAC management and staff will exercise extra caution in all interactions with government officials and members of governing bodies on national and sub-national levels, especially with respect to giving and receiving gifts, inviting, being invited to hospitality events and arrangements, as well as making procurement of goods and services from companies that are controlled by senior political power holders, renting property from persons with known political connections and affiliations, or working together with non-governmental organisations that are biased towards certain political factions, as this may jeopardise the standing and reputation of NAC.

Any appearance that NAC and NAC staff attempt to influence government officials and members of parliament for organisational and personal gain must be avoided.

"Corruption undermines funding for development and damages trust and development in society."¹

DEFINITION OF CORRUPTION

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."²

Compliance to corruption is also punishable in the same manner. It should also be emphasised 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 advantage to influence performance of a position, office or assignment. Position, office or assignment includes job duties or assignments abroad.

¹ Norad - Anti-corruption and transparency – a prerequisite for development [08.08.2024] - Ref: <https://www.norad.no/en/thematic-areas/thematic-areas-in-norwegian-aid/governance-and-economic-development/anti-corruption-and-transparency/>

² The Norwegian Penal Code (Section 387 Corruption)

NAC'S POSITION ON CORRUPTION

- NAC defines corruption as the abuse of entrusted power for personal or organisational 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 organisation when in doubt.
- NAC prohibits any form of corruption and nepotism, both within the organisation, 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 programmes.
- 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 Whistleblower 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 they themselves are involved.
 - Through the Deputy Chair, should the Chair of the Board fail to act or if s/he is involved.
 - To Norad if the Board are involved.
- NAC Senior Management must foster an understanding and culture within the organisation and among its partners where no form of corruption is tolerated.
- NAC Senior Management must act and react promptly if corruption occurs, and report suspected corruption to the donors for further action based on their requirements (e.g. Norad Guidelines for Dealing with suspicion of Financial Irregularities).³
- 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.

ANTI-CORRUPTION HANDBOOK

An Anti-Corruption Handbook has been developed to guide the implementation of the NAC 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 programmes and operations, and how to apply correct control measures throughout the organisation.

The NAC Anti-Corruption Handbook provides practical guidance on:

³ Norad - Control measures and quality in aid management [11.08.2024] – Ref: <https://www.norad.no/en/norwegian-aid/about-aid/control-measures-and-quality-in-aid-management/>

- 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 Organisational Strategy.
- Different forms of corruption.
- How to reduce corruption risks and vulnerabilities when making procurements of goods and services for programmes and operations.
- 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 NAC Policy on Anti-Corruption and the NAC Anti-Corruption Handbook provide a practical overview of NAC’s values, policies, rules and regulations relating to anti-corruption, with the aim of guiding us to always make the right decisions, and effectively combat corruption within the NAC, and among our suppliers, partners and beneficiaries.

The 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 Policy and Handbook were used and tested in all NAC projects and programme activities before final; edited versions were presented to the NAC Board for their approval in September 2018. The last Policy and Handbook were last updated in October 2025.