



# ANTI-CORRUPTION POLICY

RIGHTS  
DEMOCRACY

RECLAIM

# POLICY TO PREVENT & RESPOND TO CORRUPTION



# RECLAIM

## 1. Introduction

The continued failure of most countries to significantly control corruption is contributing to a crisis in democracy around the world, according to Transparency International. On the one hand, countries with higher rates of corruption also have weaker democratic institutions and political rights. Over 40% of the world's populist leaders are also indicted on corruption charges. On the other, high corruption rates can contribute to increased support for populist candidates.

Thus, for RECLAIM fighting corruption is not only a governance issue but a strategic objective in itself, and an important building block towards its overarching protecting democracy.

In addition, RECLAIM is entrusted with funds from a variety of donors and must ensure secure that those funds are spent correctly toward donors, partners, beneficiaries and European taxpayers when applicable.

## 2. Objective and scope of this policy

The target group of this anti-corruption policy is all RECLAIM employees.

As employees of RECLAIM we are responsible for upholding and promoting the highest standards of ethical and professional conduct. Working in different countries, sometimes in complicated and difficult situations, among different languages, cultures and religions requires a lot from the employees. Knowledge, respect and common sense are some of the keywords that should be guiding our work.

The purpose of this anti-corruption policy is to support a behaviour characterised by high standards of personal and organisational integrity, both internally and with other external stakeholders (partners).

**As RECLAIM employees, we are obligated to follow this anti-corruption policy and any breaches of this policy shall be reported through the RECLAIM complaint mechanism (specified below).**

As RECLAIM staff we are also responsible for following and abiding by the rules and regulations of national and international law. Furthermore, we have to abide by the international conventions signed by Belgium.

## 3. Definitions, principles and procedures

Corruption has many faces. It may be in the form of money or of providing services in order to gain advantages such as favourable treatment, special protection, extra services, or reduced delays. It is important to realise that corruption is not exclusively a matter of money. To provide a person with a job, services or other favours, can in certain circumstances also be construed as corruption.

**Corruption is defined as the misuse of entrusted power for private gain. Corruption is best known as bribery, fraud, embezzlement and extortion, and some of the examples will be listed in more detail below.**

The following is a listing of the principles in RECLAIM's anti-corruption policy:

1. **Conflicts of interest**
2. **Abuse of power and extortion**
3. **Fraud and Embezzlement**
4. **Bribery**
5. **Nepotism and favouritism**
6. **Gifts**

### 3.1. Conflict of interest

**We will avoid conflicts of interest – real or potential – between our personal interest and the interest of RECLAIM.**

Avoiding conflicts of interest is the overall principle in fighting corruption. Conflict of interest arises from situations in which you as a RECLAIM employee have a private interest that could influence your professional performance.

Conflicts of interest can occur quite frequently and are not necessarily corrupt. It is how they are identified and managed that is important. If conflict of interest situations are not properly identified and managed, they can endanger the integrity of RECLAIM and can result in corruption. The staff member is expected to show good judgment and when in doubt, contact the superior and disclose the potential conflict of interest.

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The following principles are all in some ways examples of conflict of interests.

## 3.2. Abuse of power and extortion

***We will not seek to influence any person or institution for private purpose by using our official position or offering them personal advantages. Likewise, we will not use RECLAIM property, facilities, services and financial resources for private purposes except when permission is given. We will not use any forms of extortion as a method to gain advantages***

This principle implies that you should not use your professional status for private gain. Misuse could be to gain advantages that you would not have gained otherwise. Relations to suppliers must not be used to gain reduced price on e.g. computers, consultant support or travelling for private use. You are also not allowed to abuse your power as a manager to get personal favours or services done by employees.

## 3.3. Fraud and Embezzlement

***Fraud and embezzlement are illegal and must not be used as methods to gain personal or professional advantages or property in relation to RECLAIM partner organisations or any other stakeholders***

Fraud is defined as economic crime involving deceit, trickery or false pretences, by which someone gains advantages or funds unlawfully. Embezzlement is defined as the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian.

Examples of fraud and embezzlement are false documentation, lying about qualifications and abusing power/knowledge to steal cash and equipment from the office, misusing funds entrusted to us.

Rules for accounting and documentation shall therefore be applied to at all times. E.g. approval of payments has to follow the "Accounting Manual" and approval of programs and projects has to be agreed by the Board and contribute to the Working Plans approved by the GA.

## 3.4. Bribery

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

Bribery is defined as the act of offering someone money, services or other valuables, in order to persuade him or her to do something in return

One example is that we do not receive bribes from potential partners to make contracts with them and we do not give bribes to our partners as a way of influencing. We base our cooperation with partner organisations on mutual ownership, accountability, participation, equality, harmonisation and alignment.

Bribery is illegal in all countries and harms the opportunities for fair trial and fair competition; it creates in- transparent business markets that can be hard or impossible to access.

## 3.5. Nepotism and favouritism

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

Nepotism is favouritism toward relatives and friends, based upon that relationship, rather than on an evaluation of ability or suitability. For instance, offering employment to a relative or friend, despite the fact that there are others who are better qualified and willing to perform the job, higher earnings, and other benefits to employees who are relatives of management.

To avoid favouritism and nepotism in procurement we follow the RECLAIM Procurement Manual and Recruitment policy.

It is important to underline that if conflicts of interests are handled, it can be acceptable to hire/work with family or friends.

## 3.6. Gifts

***We will not give or receive, directly or indirectly, any gift or other favour that may influence the exercise of our function, performance of duty or other ways of possibly harming RECLAIM.***

Gifts are defined as but not limited to: services, travel, entertainment, material things or favours. In order to respect local traditions and conventional hospitality minor gifts are accepted

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The value of an acceptable gift varies over the countries in which RECLAIM operates. Cash gifts are never accepted. All employees are expected to show good judgment and when in doubt, contact the superior. A rule of thumb is that a gift should never influence your independent judgment and share the minor gifts that you accept with your colleagues.

## 4. RECLAIM complaint mechanism & reporting

As RECLAIM employees, we are obligated to follow this anti-corruption policy and report breaches of the policy. All corruption incidents in RECLAIM, partner organisations or other incidents related to RECLAIM activities must be reported into the complaint mechanism.

***If you get a suspicion, hear rumours about corruption or experience any other doubt you can ask for advice here as well.***

### Complaint mechanism

You need to request a complaint form and sent it to [complaint@reclaiming.eu](mailto:complaint@reclaiming.eu). This e-mail box is only accessible to RECLAIM Board. On basis of the complaint, it will be considered if an investigation committee will be set up and an investigation take place.

The complaint will be handled confidentially and with great respect for the complainant and the persons/ organisations the complaint is pointing at. No anonymous complaints are accepted.

All incidents of corruption shall be reported in the complaint mechanism.

The complaint mechanism is also accessible through RECLAIM website [www.reclaiming.eu/complaints](http://www.reclaiming.eu/complaints)

### Reporting

Within the Annual Report “Anti-Corruption Report”, RECLAIM also outlines what RECLAIM does to fight and prevent corruption with the financial means administered by RECLAIM

RECLAIM is also committed to the overall fight against Money Laundering and Terrorism financing in the EU and provide adequate, accurate and timely information on the beneficial ownership of RECLAIM to the competent authorities of Belgium. This information is publicly available to interested parties at Belgium’s SPF [UBO Registry](#).

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## RECLAIM complaints policy statement

RECLAIM is committed to working in an open and responsible way, fostering the trust and respect of all its partners, advisors and staff members.

To ensure the continuous improvement of our work, RECLAIM is interested in what our partners have to say whether in the form of a comment, compliment or complaint.

## Complaints and Response Mechanism

RECLAIM establishes a transparent Complaints and Response Mechanism (hereinafter: Mechanism) in order to ensure an opportunity for individuals affiliated with our work to (i) report complaints in a secure way, (ii) have the complaints processed and (iii) receive a substantial response to the complaint. The Mechanism is made available on RECLAIM's website (<https://www.reclaiming.eu/complaints>).

The Mechanism also enables RECLAIM staff members to report personal related incidents, with a particular focus on (sexual) exploitation, abuse and/or harassment.

RECLAIM's policy for complaints and response includes the option of sending a complaint to RECLAIM online.

## Confidentiality

RECLAIM ensures that complaints are processed, and incidents are handled in confidentiality and under a reasonable period of time. The facts and nature of the complaint or incident, the identity of people involved, and the investigation records remain confidential and only available to the Complaints Committee.

## Deadlines

A complaint should be lodged, and an incident should be reported in the shortest possible time after the complainant becomes aware of the concern. RECLAIM strives to process complaints and investigate incidents within 30 days.

Serious complaints and incidents will be investigated with highest possible confidentiality and processed in the shortest possible.

## Complaint procedure

A complaint should be lodged, and an incident should be reported to the Director of RECLAIM and/or the Chair of the Governing Board. Upon receiving such a report, the Director/Chair will immediately provide for the establishment of the Complaints Committee. The Complaints Committee oversees the investigation of the complaint and/or incident and ensures that the complainant receives a substantial response.

# COMPLAINTS HANDLING MECHANISM



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## Recommendations for improvement

RECLAIM draws on the potential lessons learned from the complaint and/or incident. The Director is responsible for making sure that RECLAIM implements the recommendations for improvement.

## Appeal

If the complainant is not satisfied with the outcome, she/he may appeal the outcome within 30 days upon receipt of the decision.

