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ÖSTGRUPPEN (SWEDISH INITIATIVE FOR DEMOCRACY AND HUMAN RIGHTS)

## ANTI-CORRUPTION POLICY

A society free of corruption is a fundamental prerequisite for fair and democratic development. Any corruption within a development partnership harms the faith in and support for the aid model in general. Corruption is contrary to fundamental values such as justice, democracy, equality, dignity, integrity, transparency, and opportunity for accountability.

### DEFINITION OF CORRUPTION

Östgruppen adheres to Transparency International's definition of corruption as 'the abuse of entrusted power for illegitimate individual or group benefit.'

In essence, corruption entails the abuse of trust or the abuse of a position.

Corruption as a term covers phenomena such as bribing and receiving bribes, extortion, favoritism and nepotism, fraud, conflict of interest, and embezzlement. Other types of negligence, mismanagement or abuse of power may also constitute corruption.

### COMMITMENT

For Östgruppen it is a matter of fundamental principle to never accept corruption, to always act upon any suspicion of corruption, and to pass on information on any such suspicions. Östgruppen is to ensure:

- that all employees possess adequate knowledge of the anti-corruption policy and enforce it in their daily work;
- that those documented established routines and agreements which work to counter corruption are known and used within the organization;
- that there are clear routines and systems for handling suspected cases of corruption;
- that partners are aware of the Östgruppen anti-corruption policy.

A decisive factor in the prevention of corruption is working to strengthen the culture of good operational and financial management, i.e. 'good governance.' This can be done, among other things, by:

- promoting democratic processes characterized by participation and transparency;
- assessing the risk of corruption when establishing workplace routines and orders of delegation and attestation, when drafting agreements, and when drawing up operational, program and project plans, including budgets;
- ensuring that planned activities have clearly formulated objectives and expected results – including which specific activities are to be performed – as well as monitoring routines;
- learning from experience and continuously improving routines and forms of cooperation;
- in projects involving financial funding: assessing the capacity of partner organizations to manage the grants in a satisfactory manner;
- ensuring that reports from partner organizations are delivered on time, as well as analyzing and following up on the contents of the reports;
- carrying out random checks, aimed at detecting corruption, of partner organizations;
- ensuring that gifts to and from partners and suppliers are inexpensive enough to be considered of symbolic value;
- in the case of representation: always choosing a moderately priced restaurant as well as ensuring that alcohol is served in moderation and in accordance with the prevalent culture of the specific context.

## IN CASE OF SUSPECTED CORRUPTION

It is the responsibility of every employee to be vigilant and to take note of and report suspected corruption.

It is the responsibility of the head of office to investigate suspected cases. The financial officer and/or any concerned project managers may also be involved in the investigation of the case.

The head of office must be immediately informed of any suspected corruption. If the infraction is thought to be major, the board of directors is also to be immediately informed. In the event of a corruption case where the head of office is suspected of involvement, the board's treasurer should be informed instead.

### Current contact details:

Paulina Kluge, acting head of office	paulina.kluge@ostgruppen.se	+46 76 945 65 09
Kristina Jubel, board treasurer	kristina.jubel@ostgruppen.se	+46 76 648 16 72

If the affected funds originate from an external source, the source in question should also be promptly informed.

If corruption is suspected and Östgruppen considers a supplementary external audit of the project to be prudent, Östgruppen is to ensure that such an audit is carried out.

If a crime is suspected, the matter must be reported to the police.

If evidence of mismanagement or corruption on the part of a partner organization emerges, Östgruppen is to consider suspending its support for the project in accordance with the agreement. If no correction is made, the agreement should be terminated and Östgruppen should reclaim the funds in question.

## IMPLEMENTATION AND MONITORING

Östgruppen's head of office holds the responsibility to coordinate and monitor the implementation of the anti-corruption policy.

Measures and monitoring activities are to be documented in writing and be part of the regular operational planning and monitoring procedures of the organization.

## RELATED DOCUMENTS

The following policies and regulatory documents supplement the anti-corruption policy:

- Decision-making procedure;
- Attestation and payment routines;
- Procurement policy.

## REVISION HISTORY

The anti-corruption policy was

- adopted by the board of directors on 12 November, 2013;
- updated by the board of directors on 14 September, 2016 (sections 'In case of suspected corruption' and 'Attestation by affected parties');
- revised by program manager Maria Hamberg on 14 December, 2022;
- approved by the board of directors on 14 May, 2023 (section 'Current contact details');
- and revised by acting head of office Paulina Kluge on 4 September, 2023 (section 'Current contact details').

The document was translated into English by Inga Ollars on 10 October, 2024.

## ATTESTATION BY AFFECTED PARTIES

I have read the Östgruppen anti-corruption policy and agree to abide by its contents:

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Place and date

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Signature

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Printed name