



POLICY AGAINST FRAUD, CORRUPTION, MONEY LAUNDERING AND TERRORIST FINANCING

Approved by: Serge BREYSSE

Date of approval: 16th of January 2023

Applicable from: 1st of February 2023

CONTENTS

SUBJECT	4
SUMMARY	4
1 - SCOPE OF APPLICATION	6
2 - DEFINITIONS	6
2.1. FRAUD	6
2.2. CORRUPTION	6
2.3. MONEY LAUNDERING	6
2.4. TERRORIST FINANCING	7
3 - MANAGEMENT MEASURES: PREVENTION, DETERRENCE, DETECTION	7
3.1. PREVENTION AND DETERRENCE MEASURES	7
3.2. DETECTION MEASURES	9
4 - RÔLES AND RESPONSABILITES	10
5 - RESPONSE TO SUSPICIONS AND TREATMENT OF SUSPECTED CASES	12
6 - REPORTING PROCEDURES AND WHISTLEBLOWER PROTECTION	12
6.1. DETAILS TO BE INCLUDED IN AN ALERT	12
6.2. CONFIDENTIALITY	13
6.3. ANONYMOUS COMPLAINTS	13
6.4. PROTECTION AGAINST RETALIATION FOR REPORTING FRAUD, CORRUPTION OR MONEY LAUNDERING (WHISTLEBLOWER PROTECTION)	13
7 - INQUIRY	14
7.1. THE PROCESS OF INQUIRY	14
7.2. ACTION BASED ON INVESTIGATIONS	14
8 - REPORTING AND EXPERIENCE CAPITALISATION	15
9 - VALIDATION AND DISSEMINATION OF THE POLICY	15
APPENDIX A : DEFINITIONS AND EXEMPLES	16
APPENDIX A – 1: DEFINITIONS OF PROHIBITED PRACTICES	16
APPENDIX A – 2 : EXAMPLES OF PROHIBITED PRACTICES	17

SUBJECT

The Anti-Fraud, Corruption, Money Laundering and Terrorist Financing Policy is established by the Board of Directors.

The purpose of the scheme is to help Solthis to promote a culture of honesty and integrity within the organization. It aims to provide employees and other stakeholders with guidance on how to prevent, detect, deter, report and act on fraud, corruption, money laundering and terrorist financing.

Employees of all categories should be aware of the contents of the scheme and follow the guidelines and principles set out in it. They should also be aware that the commission of such acts will result in disciplinary action ranging from written reprimand to dismissal and prosecution.

The publication of this policy is accompanied by a training campaign at headquarters, country office (mission) level and among all stakeholders. The campaign aims to raise awareness of the prohibited acts and the Board's efforts to prevent them.

SUMMARY

This Policy is part of Solthis' organizational risk management and is implemented through the adoption of prevention and detection measures in all key organizational processes. It reflects Solthis' **commitment to the highest standards of ethics, transparency, good governance and accountability.**

It is the **primary responsibility of Solthis staff, including management, to combat fraud, corruption, money laundering and the financing of terrorism**, and this responsibility extends to Solthis' relationships with third parties. The Board of Directors has a **zero tolerance policy** towards acts of fraud, corruption, money laundering and financing of terrorism involving its own employees, other staff members or third parties in their working relationship with the organization. This means that all allegations of fraudulent acts committed by any individual or entity with a contractual relationship with the organization will be examined very carefully. Prohibited practices include **"fraud", "corruption" and "money laundering"**.

Fraud is any act or omission by which an individual or entity knowingly distorts or conceals a material fact in order to obtain for the perpetrator or a third party an unjustified benefit or advantage, or to induce a third party to act to their detriment.

Corruption is any act or omission constituting an abuse of power or intended to induce an abuse of power in order to obtain an unjustified advantage for the perpetrator or a third party.

Money laundering is the act of passing off illegally acquired money as clean.

A prohibited practice is considered to be **professional misconduct**. When committed by employees, such acts expose the perpetrator to **disciplinary measures** ranging from written censure to dismissal. It may also result in the **recovery of financial losses** to the organization and, where appropriate, the reporting of credible allegations of wrongdoing to **national authorities**.

Solthis employees and other stakeholders have an **obligation to report possible instances of prohibited practices**. In addition, Solthis has **several ways to report suspicious acts in a confidential and anonymous manner**.

Solthis is required to ensure the anonymity of individuals who report suspected fraudulent acts. The organization has a **policy of protection against possible retaliation that applies to employees and stakeholders who report misconduct**.

INTRODUCTION

Whatever its nature, the act of fraud, corruption, money laundering, financing of terrorism, has the effect of diminishing the funds and other resources intended to support the mission of Solthis, compromising its effective functioning and the accomplishment of the mission. In addition, fraudulent and corrupt behavior can seriously damage Solthis' reputation and reduce the trust that donors place in it as an organization capable of delivering results in an accountable and transparent manner.

Solthis staff members are all managers of the resources that have been entrusted to our organization. They are therefore accountable for the proper and efficient use of these resources by their care.

Solthis' Fraud and Other Prohibited Practices Policy is an important element of the organization's governance, setting out the framework for actions to effectively prevent, identify, report and address prohibited practices. It is consistent with the organization's values and ethical standards in order to increase transparency and ensure the sound management of resources. It aims to hold organizational, financial and operational management accountable, to ensure the effectiveness of internal controls, to prevent, detect and investigate acts of fraud, corruption, money laundering and to promote the integrity of the organization.

The Anti-Fraud, Anti-Corruption, Anti-Money Laundering and Anti-Terrorist Financing Policy also takes into account Solthis' role in the efforts of donors and international solidarity organizations against prohibited practices as a whole.

1 - SCOPE OF APPLICATION

This Policy applies to all Solthis activities and operations, including all projects implemented by Solthis and its implementing partners. It aims to prevent and detect acts of fraud, corruption, money laundering and terrorist financing:

- involving Solthis employees and people working for the organization, including consultants, contractors, interns, volunteers and volunteers;
- committed against Solthis by suppliers of goods and services, implementing partners or other third parties.

This Policy should be considered in conjunction with other Solthis internal policies.

2 - DEFINITIONS

2.1. FRAUD

The definition of fraud may vary from country to country and jurisdiction to jurisdiction. Fraud is **any act or omission to intentionally deceive or attempt to deceive a party in order to obtain a financial or other advantage or to avoid an** of offences such as swindling, theft, any embezzlement, creation of false documents, breach of trust, forgery, etc.

2.2. CORRUPTION

Corruption is a term used to describe various types of unlawful acts, intended to cause undue advantage. Corruption can be defined as the **offering, giving, receiving or soliciting of corrupt payments (i.e. items of value paid to obtain an advantage contrary to the rights of others) in order to influence an official act or professional decision**. It can take many forms, including bribery, collusion, influence peddling, illegal gratification, financial extortion, etc.

2.3. MONEY LAUNDERING

The concept of money laundering is known as **a process that aims to conceal the origin and true owner of the proceeds of prior criminal or delinquent acts by reinvesting them in perfectly legal activities or operations in order to make them appear perfectly legal**. Money laundering is characterized by a series of operations to be carried out simultaneously or successively, in order to conceal any link between an original offence, the material gains resulting from it and their real beneficiary.

2.4. TERRORIST FINANCING

Terrorist financing is when an employee, partner or service **provider provides or collects or manages funds, directly or indirectly, with the intention that they be used or in the knowledge that they will be used to commit a terrorist act.**

In Annex A:

- The definition of prohibited practices referred to in this policy
- Concrete examples of prohibited practices to illustrate this policy

3 - MANAGEMENT MEASURES: PREVENTION, DETERRENCE, DETECTION

Solthis supports a culture of deterrence and prevention. Preventing and deterring fraud, corruption and other prohibited practices is more effective and less costly than taking action to detect these acts and punish those that have been committed. The application of this Policy encourages the active implementation of prevention and detection measures as part of the organization's administrative procedures, operational systems and internal control mechanisms.

3.1. PREVENTION AND DETERRENCE MEASURES

The prevention and deterrence of fraud, corruption, money laundering and terrorist financing aims to proactively identify and assess the risks of fraudulent acts and take measures to deal with them. For Solthis, this is the first line of defense against fraudulent activities in the organization.

A. Anti-fraud, anti-corruption, anti-money laundering and anti-terrorist financing awareness and training.

To ensure that Solthis staff members are aware of their responsibilities in the fight against fraud, corruption, money laundering and terrorist financing, it is essential that a communication and awareness plan regarding this Policy is put in place so that it is integrated into Solthis' processes, procedures and culture.

To this end, management and team leaders reaffirm to their teams the obligation to report any act of suspicion, as already required by the internal regulations of each country of operation and the organization's Staff Regulations.

The communication and awareness programs for this Prohibited Practices Policy include the following components:

- provision of reference documents for all stakeholders via the Solthis intranet;

- training of new recruits and regular awareness raising of Solthis and partner teams;
- reference to the Policy in all partner and service provider contracts.

B. Managing the risk of fraud, corruption, money laundering and terrorist financing

The risk of fraud, corruption, money laundering and terrorist financing is managed in accordance with Solthis' risk mapping and the internal control system in place. All staff members, other persons working for Solthis and, where applicable, third parties involved in operations or programs financed by Solthis, must identify and report the risk of prohibited practices to the Administrative and Financial Management for a continuous update of the risk map. This assessment consists of systematically identifying the areas that are most exposed to potential prohibited acts and developing appropriate strategies to mitigate these risks.

C. Support for the internal control system

When managers identify and assess a risk related to a prohibited practice, they must define the appropriate measures, through the application of controls, to ensure that this risk does not turn into an actual act. This vigilance may involve taking control measures beyond those provided for in the Solthis Administrative and Financial Procedure (PAF), which prescribes the minimum internal control standards to be observed, as well as consultations with the relevant head office departments.

D. Prevention of conflicts of interest

A "conflict of interest" occurs when a staff member's private interests, for example, outside business relationships or personal financial assets, interfere with the proper performance of their duties as an employee of Solthis.

A conflict of interest can be:

- current: private interests impinge on official responsibilities,
- apparent: private interests could reasonably be seen to impinge on official responsibilities,
- potential: private interests could impinge on official responsibilities.

Conflict of interest situations do not necessarily lead to corruption, wrongdoing or other inappropriate activities. However, if such situations are not properly identified and managed, they could compromise (or be perceived as compromising) the professional integrity of the individuals concerned or signal a potential fraud situation. It is the responsibility of staff to avoid situations where they could be seen to benefit directly or indirectly, or to allow a third party to benefit improperly, from decisions they may make.

Staff members are formally required to disclose their private interests in the course of their duties to enable the organization to take appropriate action.

E. Integrity as a key criterion in selection procedures

This Policy emphasizes the importance of integrity in the selection of staff members. Integrity should be recognized as such as an essential component in the recruitment and promotion of Solthis employees. For this reason, emphasizing the role of integrity as a criterion in the selection process will enable those responsible for selection to apply the principles of the Solthis Code of Conduct while preventing fraud and other corrupt practices. Recruiters should ensure that specific assessment tools are used to verify the integrity, background and education of candidates. In addition, they should ensure that candidates are aware of the obligation to declare their family and marital relationships as part of the recruitment process (personal information form).

F. Screening of partners and service providers

Requirement for screening of the various stakeholders has been implemented within the organization in order to limit the risks of prohibited practices. Solthis applies a zero tolerance policy with regard to prohibited practices, and no contract should be entered into with an entity or person who appears on one of the following lists of sanctions:

- the United Nations blacklist;
- the European Union blacklist;
- the French blacklist;
- the blacklist of intervention countries.

Solthis' screening procedure is regularly updated according to the organization's legal and contractual requirements.

3.2. DETECTION MEASURES

Detection measures aim to detect prohibited practices if they occur. They include:

- the establishment of a confidential reporting system (hotline);
- implementing proactive controls for the detection process of fraudulent acts, such as independent reconciliations, reviews, inspections, analyses and internal and external audits;

4 - RÔLES AND RESPONSABILITIES

All Solthis staff members have a responsibility to protect Solthis' resources and preserve the organization's reputation.

Within the framework of this Policy, their respective roles and responsibilities are as follows:

- **Board of Directors:** has the primary responsibility to ensure that Solthis maintains a culture of ethics, transparency and accountability. To this end, it sends a clear message to stakeholders, both internal and external, that no acts of fraud, corruption or other prohibited practices will be tolerated.
- **General Management:** as the guarantor of the achievement of Solthis' objectives, General Management's primary responsibility is to ensure the promotion of the culture and the application of this policy. It is the guarantor of the management of the risk of fraud, corruption, money laundering and financing of terrorism, through the promotion of good governance and culture, by setting the tone in the organization, by insisting on the importance of risk management and by defining the responsibilities for monitoring this process. By virtue of the authority delegated to it by the Board of Directors, the Executive Board is responsible for guiding efforts to raise awareness of these issues and to promote a culture based on prevention and deterrence.
- **The Administrative and Financial Department:** it is responsible to the General Management for establishing and maintaining a sound internal control system that supports the management of financial resources. This internal control system aims to manage and address the financial risks to which Solthis is exposed.
- **The Human Resources Department:** is responsible, in coordination with the relevant recruitment managers, for ensuring that Solthis takes the necessary steps under the due diligence principle before recruiting staff. To this end, she conducts academic background checks on Solthis staff members. It also conducts reference checks on Solthis staff members (other than those on short-term contracts, i.e. those on short-term or special employment contracts and trainees). It also ensures that consistent recruitment procedures are in place. In addition, the Human Resources Department is responsible for monitoring training and periodically reviewing the understanding of this Policy.
- **Employees in management positions:** Line managers have day-to-day responsibility for the prevention and detection of fraud, corruption and other prohibited practices. Line managers are also responsible for promoting a 'lead by example at the highest level' approach to reflect the organization's zero tolerance policy towards fraud, corruption and other prohibited practices. This includes demonstrating vigilance against the risk of fraud and taking proactive steps to prevent and identify potential fraudulent and other prohibited practices. In particular, it is the responsibility of line managers and managers at

all levels to make their employees aware of the risk of fraud, corruption and other prohibited practices, in order to raise awareness of this risk;

- Conducting risk assessments to determine which of Solthis' assets, programs, activities and interests are exposed to the risk of fraud and to assess the level and impact of these risks;
- Choose the most appropriate option to address the risk, i.e. accept, reject, transfer or mitigate the risk by designing and implementing controls for prevention and detection;
- Monitor and supervise the professional conduct, working methods and performance of their employees to ensure that their behavior is in line with the highest ethical and professional standards;
- Seek advice, as appropriate, from administrative and financial coordinators, administrative and financial officers;
- Managers who fail to take appropriate action or who tolerate or condone acts of fraud, corruption or other prohibited practices will be held accountable.

○ **All Solthis staff**, beneficiary associations, service providers and other third parties: All are responsible for complying with the Solthis Code of Ethics and the standards set out in the organization's regulations, rules and administrative texts, as well as the contractual agreements concluded with Solthis. In particular, they are responsible for:

- to act in all circumstances with the highest standards of integrity;
- not to engage in, condone or facilitate, or appear to condone or facilitate, any prohibited practices;
- ensure that they are not in a situation that could give rise to a conflict of interest and promptly report any situation in which there is a potential or suspected conflict of interest;
- as guarantors of Solthis resources, avoid any use of Solthis funds, resources or assets that is contrary to this Policy;
- detect, prevent and report any act or attempt of fraud, corruption and other prohibited practices in accordance with this Policy
- exercise due diligence before entering into agreements with third parties, and be vigilant in the management of funds, resources and/or assets belonging to or entrusted to Solthis, applying established risk control mechanisms, so as to mitigate the risks of fraud, corruption, money laundering and terrorist financing;
- promptly report any practice that is, or may reasonably be suspected to be, contrary to this Policy, or any attempt to do so, as described above.

○ **External auditor:** In accordance with international auditing standards, the external auditor is responsible for drawing the attention of the Board of Directors to cases of fraud, corruption and other prohibited practices.

5 - RESPONSE TO SUSPICIONS AND TREATMENT OF SUSPECTED CASES

Solthis' zero-tolerance policy on fraud, corruption, money laundering and terrorist financing implements responses to proven cases of fraudulent acts.

In case of suspicion, the following actions may be taken:

- 🕒 investigate the allegation to determine the party or parties responsible, the means of the offence and the extent of the resulting damage;
 - 🕒 sanction the perpetrator(s) either through employment sanctions or legal action in accordance with the law;
 - 🕒 remedy the control weaknesses that enabled the fraudulent acts to be undertaken.
-

6 - REPORTING PROCEDURES AND WHISTLEBLOWER PROTECTION

Staff members and others working for Solthis are required to report any information regarding prohibited practices committed by Solthis members or affecting Solthis funds and assets. Others who may have such information are strongly encouraged to report such incidents.

Solthis has established an investigation hotline and other means so that individuals wishing to report prohibited practices can do so free of charge, using a variety of options.

- 🕒 **Anonymous** fraud, corruption and money laundering reporting form available on the Solthis website following this link: <https://www.solthis.org/fr/signaler-un-cas-de-fraude-de-corruption-ou-de-blanchiment-dargent/>
- 🕒 Telephone number: + 33 (0) 1 81 70 17 90
- 🕒 Send an email to: **solthishotline@solthis.org**
- 🕒 Ordinary postal mail to :
Solthis – Direction Générale
14-34 Avenue Jean Jaurès
75019 Paris - France

6.1. DETAILS TO BE INCLUDED IN AN ALERT

To give the investigation the best chance of success, the report should be as detailed as possible. If possible, it should contain the following information:

- 🕒 types of alleged wrongdoing;
- 🕒 where and when the events in question occurred;
- 🕒 who is involved and who has knowledge of the reported incidents;
- 🕒 how the alleged wrongdoing was committed by the individual, the organization or a third party;
- 🕒 why is the incident being reported?
- 🕒 what are the causes of the reported incident;
- 🕒 what are the consequences of the reported incident.

All information and evidence (e.g. documents, photos) relevant for a proper assessment should be attached to the alert and sent as soon as possible.

6.2. CONFIDENTIALITY

All investigations conducted by Solthis must remain confidential. Participants in the investigation (witnesses and targets) will be reminded of the need to keep the investigation process confidential. Specific reports and details of the investigation may only be released to those who need them. Requests for confidentiality from complainants will be honored to the extent possible and consistent with the legitimate requirements of the investigation.

6.3. ANONYMOUS COMPLAINTS

Persons wishing to protect their identity may report acts of fraud, corruption and money laundering anonymously. In the case of anonymous reports, a report number and code is used to allow the complainant to provide any response to the investigation, and to be aware of any new requests for information from the case team.

However, anonymous allegations may be more difficult to assess and investigate. For this reason, individuals wishing to submit a report are encouraged to provide their contact information. Solthis will treat the information received with care and will limit as much as possible the disclosure of information that could reveal the identity of the reporter.

6.4. PROTECTION AGAINST RETALIATION FOR REPORTING FRAUD, CORRUPTION OR MONEY LAUNDERING (WHISTLEBLOWER PROTECTION)

Solthis has put in place a whistleblower protection memorandum: Administrative Memorandum on the

Protection of Whistleblowers against Retaliation, effective upon signature of this Policy.

The purpose of the Note is to enable the organization to identify and prevent prohibited practices by offering protection to staff members who report them or who cooperate with a duly authorized audit or investigation.

A staff member who has reported allegations of wrongdoing or cooperated with a duly authorized audit or investigation and who has been the victim of retaliatory action as a result shall be entitled to protection. Solthis volunteers or interns shall have the same rights of protection as staff and service providers to the extent possible.








7 - INQUIRY

7.1. THE PROCESS OF INQUIRY

Solthis follows up on all allegations of prohibited practices brought to its attention. It may also initiate proactive investigations in high-risk areas where there is a particular risk of fraud or corruption. Solthis may request additional information to enable it to make a thorough assessment. From the moment the case merits investigation by Solthis, the matter may be referred to an internal Department, a fraud investigator, an expert service provider, or the police, who will conduct an objective investigation based on all available facts. This investigation will involve the collection and review of all relevant documents, interviews with potential informants, and questioning of those suspected of being involved in fraud. The Directorate will coordinate with other law enforcement agencies and bodies as appropriate to ensure the effective investigation of suspected fraud involving multiple units or parties outside Solthis.

7.2. ACTION BASED ON INVESTIGATIONS

The investigation may result in one or more of the following actions:

-  referral to the Human Resources Department for legal support, for consideration of disciplinary measures against staff members;
 -  referral to national law enforcement or criminal investigation;
 -  recovery of funds and assets;
 -  exclusion of the supplier, provider, consultant, from the list of approved providers;
 -  exclusion of the association from the list of potential Solthis partners;
 -  exclusion of the beneficiary from potential Solthis projects;
 -  referral to the Administrative and Financial Department for risk limitation and actions to strengthen the internal control system.
-

8 - REPORTING AND EXPERIENCE CAPITALISATION

Reporting is an important part of the communication, awareness and deterrence components of the anti-fraud, anti-corruption, anti-money laundering and anti-terrorist financing policy.

All cases and investigations carried out are kept for 10 years and are compiled in an anonymized tracking table.

9 - VALIDATION AND DISSEMINATION OF THE POLICY

This version of the Anti-Fraud, Corruption, Money Laundering and Terrorist Financing Policy is applicable from the date of its signature by the Executive Board. This Policy will be reviewed at regular intervals.

All Solthis staff will be trained in the application of this policy and its strict observance.

This policy is linked to other policies, memoranda and organizational guidelines, including (but not limited to):

- Solthis' internal rules;
- the Solthis Charter;
- the internal audit charter;
- image rights;
- code of conduct.

APPENDIX A : DEFINITIONS AND EXAMPLES

APPENDIX A – 1: DEFINITIONS OF PROHIBITED PRACTICES

This list is non-exhaustive

Corruption

The fact that an employee asks for or accepts **any benefit in return** for the performance or non-performance of an act of their function.

Influence-peddling

The act of an employee accepting or demanding an advantage in order to **use their influence** on a transaction, a project or a contract in return.

Illegal interest taking

The act of an employee **taking, receiving or retaining a personal interest** in a matter of which he or she has knowledge in the course of their duties.

Embezzlement

Destroying, misappropriating or removing Solthis funds or property entrusted to an employee or recipient of Solthis funds by virtue of their duties or mission.

Bribery

The act of an employee taking advantage of their position to **knowingly receive undue payments**.

Favouritism

The fact that an employee grants an **unjustified advantage** to a company, a service provider, a beneficiary or a partner because of non-compliance with the principles of the **order, contract, employment or project**: equal treatment of candidates, freedom of access and transparency of procedures.

Colluding

An arrangement between two or more parties to achieve an improper purpose, including improperly influencing the actions of another party. This includes at least two of the following parties: a contractor, an employee of Solthis, a partner...

Illegal gifts and invitations

Receiving gifts and invitations from a contractor, partner, supplier or any other person that may influence a decision taken in the course of the organization's work.

Concealment by benefiting from the proceeds of the offence










The acquisition by Solthis staff of ill-gotten gains, proceeds of crime or misdemeanor on behalf of Solthis.

Obstructive practice

The act of an employee of Solthis, a service provider or a partner to act in a manner that materially hinders the exercise of contractual audit, investigative and access to information rights, including the destruction, falsification, alteration or concealment of evidence in an investigation of alleged fraud or corruption.

APPENDIX A – 2 : EXAMPLES OF PROHIBITED PRACTICES

The following is a non-exhaustive list of examples of fraud, corruption and other prohibited practices such as money and money laundering: F

-  falsification des documents ;
-  falsely registering in Solthis' systems or making false statements in order to gain a financial or other advantage for oneself or others;
-  collusion or any other anti-competitive maneuver between suppliers in a tender process to influence the award of the contract by Solthis;
-  deliberate provision by the applicant of false information regarding dependants, housing benefit, home leave travel or other benefits in order to gain a financial advantage;
-  falsifying the signature of a Solthis staff member or falsifying a document to induce a party outside Solthis to act;
-  using another user's computer identity or password, or creating false identities or passwords, without consent or authorization, to manipulate Solthis procedures or to have actions approved or denied;
-  unauthorised acceptance of gifts or invitations such as meals or leisure activities from a supplier, contractor, beneficiary association;
-  misrepresentation of employment status to Solthis in order to obtain an advantage from a government entity or private sector entity;
-  failure to declare a financial or family interest in a company or in the business of a third party while participating in a procurement or contract management process for that company or

third party;

- covering the costs of personal travel as part of official travel;
- misrepresentation, including with regard to educational or professional qualifications, on a personal history form in connection with the submission of a job application; Falsification of documents, false statements, false entries in Solthis systems or other fraudulent acts at the expense of those sought to be disadvantaged, or to discredit an individual, program or organization;
- submitting claims for reimbursement of expenses incurred by partners that were known to be unallowable and unsupported;
- misuse of assets, products and other supplies or knowingly allowing partners and other third parties to do so;
- soliciting or accepting a bribe / favor for the award of a contract, service or supply to a supplier, consultant or contractor;
- undermining or harming, or threatening to undermine or harm, directly or indirectly, a colleague or superior in order to obtain an improperly favorable performance evaluation;
- soliciting a bribe / favor for signing a framework agreement, grant contract with implementing partners;
- awarding a contract, service to a provider or supplier who is subject to legal proceedings, suspected money laundering and illegal activities;
- financial support to organizations involved in armed and political conflicts.