



مؤسسة نهر الأردن
Jordan River Foundation

JORDAN RIVER FOUNDATION

SHARED SERVICES DIVISION

HUMAN RESOURCES DEPARTMENT

ANTI-CORRUPTION POLICY

SSDHR_POL04 V2.1

Revision History		
Date of Revision	Version	Summary of Revision
April 26, 2022	2.0	Amendment of <u>policy title and description section</u> (1.C, 2, 3.D.F.G.I.M, and 4.B)
April 4, 2024	2.1	Update Fraud definition below; <ul style="list-style-type: none">▪ Falsifying, destruction, removal, or inappropriate use of official records, furniture, fixtures, and equipment;

OBJECTIVE	To provide and maintain a safe environment for employees and stakeholders, that detects and prevents fraud, corruption, misappropriations, and other irregularities, and to set out the action to be taken where a fraud or corruption is detected or suspected.
ELIGIBILITY	JRF staff and stakeholders (volunteers, interns, beneficiaries, partners, and contractors)
EXCEPTION	None
DESCRIPTION	<p>1. Zero tolerance on Corruption and all its forms:</p> <ul style="list-style-type: none"> a. JRF’s position to fraud and corruption is to take a zero tolerance approach, and is committed to pursuing this approach throughout JRF’s operational practices. b. JRF is committed to complying with the laws and regulations, and will cooperate with appropriate law enforcement or regulatory agencies. All suspected potential fraud will be investigated and if appropriate, pursued for prosecution. c. For ease of reference, the term “corruption acts” when used in the rest of this document, is understood to include corruption acts and all its forms (fraud, bribery, Misappropriation, extortion, favoritism/nepotism, misuse of information, money laundering, and Conflicts of interest). <p>2. Terms and Definitions:</p> <ul style="list-style-type: none"> ▪ Corruption: The abuse of entrusted power for private gain" or the offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party. Corruption may take form of an undisclosed conflict of interest, unauthorized acceptance of honors,

gifts or remuneration, bribery (including kickbacks), illegal gratuities or economic extortion.

- **Fraud:** A deliberate act of dishonestly which uses deception to gain some form of benefit (or advantage), or someone else experiences a loss.
 - Any dishonest or fraudulent act.
 - Misappropriation of funds, securities, supplies, or other assets.
 - Impropriety in the handling or reporting of money or financial transactions.
 - Profiteering as a result of insider knowledge of JRF activities.
 - Disclosing confidential and proprietary information to outside parties.
 - Accepting or seeking anything of material value from stakeholders (volunteers, Interns, beneficiaries, contractors, vendors, or service providers).
 - Falsifying, destruction, removal, or inappropriate use of official records, furniture, fixtures, and equipment;
 - Any similar or related irregularity
- **Bribery:** Offering, giving, receiving or soliciting of any item of value to influence the actions of another in order to obtain an undue advantage.
- **Misappropriation:** The intentional use or misuse of property or assets for an individual's own use, or for another unauthorized purposes.
- **Extortion:** Obtaining money (or other benefit) through the use of force or threats. Usually involves the use of fear or intimidation.
- **Favouritism/Nepotism:** Occurs when a person or group of people are given unfair preferential treatment at the expense of others.
- **Misuse of Information:** Unauthorized access and disclosure of information by staff. The information can include operational or financial data, personal details of staff and beneficiaries, or other forms of intellectual property owned by the organization.

- **Money Laundering:** Involves hiding, disguising or legitimizing the true origin and ownership of money derived from illegal acts, to give it the appearance that it has come from a legitimate source. Closely linked to terrorist financing.
- **Conflicts of Interest:** Arise when the personal or private interests of a staff member may influence, or be seen to influence, their professional duties.

3. Anti-Corruption policy:

- a. JRF expects its stakeholders to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corruption acts.
- b. JRF management should be familiar with the types of corruption acts that might occur in their area, to be alert for any indication of corruption or improper activity and to maintain proper controls to avoid such occurrences.
- c. JRF management should also ensure that all staff be encouraged to report suspected issues of corruption acts.
- d. JRF management shall identify and record corruption risks at the strategic and operational/functional level, and shall develop and implement risk mitigation strategies as needed.
- e. All JRF staff are required to disclose corruption acts as soon as they arise or the staff member becomes aware of any.
- f. All JRF staff have a duty to comply with the foundation's policies, rules, and regulations, as well as relevant administrative instructions and the Foundation's Code of Conduct. In the context of the prevention and detection of corruption acts, all staff members have a duty to assist in combating corruption and to report instances of possible misconduct, as well as any information that relates to misconduct they have observed.

- g. All JRF staff must strictly avoid any corruption acts or even the appearance of a corruption act, and as such; employees should have no reluctance to make full disclosure of their actions or relationships with perspective vendors, contractors, or consultants. No staff member shall be engaged in any conduct resulting in a potential conflict of interest.
- h. No staff member shall participate in the selection, final choice, or management of a contract covered by donor funds, if a real or apparent conflict of interest is involved.
- i. Any declaration of a conflict of interest by JRF employees must be reported to Human Resources and should be recorded in the “Jordan River Foundation Declaration Registry” along with the action(s) taken in response to conflict.
- j. JRF forbids payment, favors, and offers of payment/favors to officials, political parties, or candidates for political office in order to gain any competitive advantage over other parties in the award of government business, licensing, or other exercise of government discretion.
- k. All JRF staff shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, sub-recipients or parties of project contractors.
- l. Any payment, gift, or other transfer of a thing of value with an eye toward influencing government decision-making must first be presented to JRF’s legal advisor for authorization. Further, because the conduct of JRF’s partners and agents bears upon JRF’s liability, it is the responsibility of the JRF staff member engaging the services of a contractor or entering into a joint venture arrangement with a third-party to inquire into the business practices of that entity to determine whether they make potentially illegal

bribes. Should it appear that the third-party entity engages in questionable practice, notify JRF's legal advisor for guidance.

m. JRF employees may not accept gifts of any kind from stakeholders, to ensure that an individual's actions are not viewed as reflecting preferential treatment for an individual or entity. In the event that any payments/goods/gifts are offered to JRF employees, it should be reported to Human Resources and should be recorded in the "JRF Declaration Register" stating the reason for the goods/gifts.

n. It is the duty of every JRF staff member and stakeholder to:

i. *Comply with* JRF policies and the laws of the Hashemite Kingdom of Jordan;

ii. *Refrain from* making any corrupt payment, regardless of amount, to foreign government or political party officials either directly or indirectly;

iii. *Refrain from* using JRF assets for any illegal or unethical purpose;

iv. *Refrain from* creating or maintaining secret funds or assets for any purpose;

v. *Adhere to* JRF accounting policies and internal control procedures;

vi. *Refrain from* making false or misleading entries in JRF records or making any payment on behalf of JRF without adequate supporting documentation; and

vii. *Report all* violations of JRF financial and accounting policies to JRF's Management.

4. Reporting of Suspected Corruption Acts:

a. All JRF staff are required to report issues of suspected corruption acts by email to anti-corruption@jrf.org.jo, which is accessed by the Anti-Corruption Response Member (Institutional Development Senior Manager - assigned by the Director General) (*Appendix-1*).

- b. JRF has zero tolerance to any form of retaliation against reporting persons (also known as 'whistle-blowers').
- c. A staff member who suspects corruption should not do any of the following:
 - i. Contact the suspected individual(s) directly in an effort to determine facts, demand explanations or restitution.
 - ii. Discuss the issue with anyone within Concern other than the DG and/or the Fraud Response Member.
 - iii. Discuss the issue with anyone outside of Concern, except as required by law.
- d. At the DG direction, investigations may be carried out by an in-house Investigation Committee assigned by the DG (Anti-Corruption Response Committee), or the internal auditor (which is an outsourced function).
- e. The DG shall set out a clear terms of reference for the assigned Investigation Committee including, scope of investigation, and the timeline for expected work and reports.
- f. The purpose of conducting an investigation is to gather evidence and facts to establish whether suspicions or allegations are true, and whether any proven incidents are isolated or more widespread.
- g. Assigned Investigation Committee should be objective and unbiased, thorough, able to maintain confidentiality, competent in investigative techniques, empowered with sufficient seniority and confidence, honest persons of integrity, and independent of any possible subsequent disciplinary process.
- h. Assigned Investigation Committee will have free and unrestricted access to all JRF records and the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who

	<p>might use or have custody of any such items or facilities when it is within the scope of their investigation.</p> <p>i. Minutes of the Investigation Committee meetings shall be taken and filed after approval by the Committee. A copy will be sent to the members of the Committee, provided that the minutes shall be deemed to be a confidential document that shall not be disclosed to any person without the prior written authority of the DG in consultation with a Legal Advisor.</p> <p>j. The Decision to prosecute or refer the investigation results to the appropriate law enforcement and/or regulatory agencies for independent investigation will be made, at the direction of the DG and based on the investigation committee’s recommendations.</p> <p>k. If the investigation substantiates that corruption activities have occurred, the Investigation Committee shall issue a report to the DG and, if appropriate, to the Board of Directors.</p> <p>l. JRF has zero tolerance to anyone who is found to have wilfully, deliberately and knowingly make false accusations of corruption acts. Appropriate disciplinary measures will be taken.</p>
<p>PROCESS</p>	<ul style="list-style-type: none"> ● IP-QMDID003: External Feedback/Complaint Response Mechanism ● IP-SSDHR008: Internal Complaints Process
<p>REFERENCE POLICIES</p>	<ul style="list-style-type: none"> ● Grievance Handling ● Disciplinary Action/Table of Discipline ● Termination ● JRF Code of Ethics

Appendix 1 – The Roles and Responsibilities of the Anti-Corruption Response Member

The roles and responsibilities of the Anti-Corruption Response Member are to:

- Communicate suspected corruption acts to the Director General and manage other internal and external communications as appropriate
- Update the Corruption Case Register
- Open a case to hold all emails, meeting minutes, reports, and other information relevant to the case. The file should be held in a safe and secure place
- Document meetings, decisions and learning
- Maintain confidentiality, especially with respect to the reporting person and the person accused of alleged corruption act
- Ensure the reporting person is supported and protected from harm
- Take urgent steps to protect assets or information as needed
- Make preliminary investigations if requested by DG