



## **VIDEA - Anti-Corruption Policy**

VIDEA is committed to ending global poverty and creating a more just and equitable world. We live in a world where extreme poverty and a lack of access to education, health care, a clean environment, gender equality, human rights and economic opportunities are a reality for many. The challenges of poverty are exacerbated by corruption, a fundamental issue that afflicts the everyday lives of the very poorest and thwarts global efforts to lift countries out of poverty.

Not only does corruption affect economic development in terms of economic efficiency and growth, it also affects equitable distribution of resources across the population, increasing income inequalities, undermining the effectiveness of gender equality and social welfare programmes, and ultimately resulting in lower levels of human development. This, in turn, may undermine long-term sustainable development, economic growth and equality.

VIDEA is committed to complying with the anti-corruption laws in all countries in which it operates. This includes, but is not limited to, laws in Canada, and international laws such as anti-corruption laws enacted in each country where VIDEA works or employs partner organisations. VIDEA will actively and closely monitor the adherence of all of its employees, volunteers and partners with whom they conduct business. VIDEA will also continue to address ethical and legal obligations in countries outside Canada which are subject to anti-corruption laws.

### **Anti-Corruption Policy**

VIDEA does not tolerate fraud and corruption and is committed to ensuring that its systems, procedures and practices reduce the risk of occurrences to an absolute minimum. Fraud and corruption comprise acts of fraud, theft, bribery, nepotism, money laundering, terrorism financing, abuse of an undeclared conflict of interest, counterfeit money, cyber-crime, extortion and other forms of financial crime.

All VIDEA staff, board members and volunteers, must not make, offer to make, or promise to make payments (regardless of whether the payment is actually made) or give anything of value directly or indirectly to any third party, including any Government Official and/or public service

provider, to assist VIDEA in obtaining or retaining an improper business advantage, whether or not any benefit is received. Prohibited payments include:

- Payments securing an improper advantage, including a decision to select VIDEA to provide any services, or to provide VIDEA with more preferential terms that may provide VIDEA an improper advantage;
- Improper gifts, hospitality or other non-monetary items provided to any Government Official and/or other public service provider that do not comply with the anti-corruption policy
- Payments to influence any act or decision of a Government Official in his or her official capacity;
- Payments to influence the Government Official to abuse his or her power for private gain;
- Payments to induce a Government Official to perform or fail to perform any act;
- Payments inducing a Government Official to use his or her influence with a government or government instrumentality to affect or influence any act or decision of a government or instrumentality;
- Any facilitation payments made without the approval of the Finance Committee;
- Any gifts or entertainment provided to any regulatory, customs, or otherwise similarly situated Government Official;
- Any travel expenses of any regulatory, customs, or otherwise similarly situated Government Official; unless expressly preapproved by the Board of Directors for legitimate business purposes; and
- Any political contribution by VIDEA.

### **Reporting Responsibility:**

It is the responsibility of all VIDEA managers to ensure the delivery of this policy and to promote it as relevant in all aspects of their work, to hold themselves and others to account and to help create a safe environment for all. All employees, Board members or volunteers have a responsibility to report any conduct that they believe may violate this Policy. They may report such conduct to any VIDEA managers, or to any one of the VIDEA Board Members. Reports of violations must be reported in writing. All such reports will be treated as confidential and be used only for the purpose of addressing the specific problem reported. Such reports will be shared by VIDEA board members and other authorized individuals only on a need-to-know basis. Unless acting in bad faith, VIDEA employees and volunteers will not be subject to reprisals for reporting information about potential violations.

### **Roles:**

VIDEA Board Members and the VIDEA Finance committee are responsible for:



- Ensuring that reasonable steps are taken to prevent fraud and corruption of VIDEA's funds and that proper, robust financial controls and procedures suitable for VIDEA's activity are in place;
- Ensuring that VIDEA managers act responsibly and in the interests of VIDEA when dealing with suspected financial abuse;
- Ensuring adequate resources are allocated to tackle the risk of fraud and corruption;
- Ensuring reporting to authorities is done as required.

#### Executive Director:

- Act with integrity, in line with this policy and maintain a working environment that will foster an anti-corruption culture;
- Ensure the effective control and reduction of the risk of fraud and corrupt practices across the organisation as dictated by the Board;
- Delegate the day-to-day management of this Policy and associated procedures to VIDEA managers;
- Ensure that staff, interns and volunteers understand the many forms of corruption in all of the countries in which they work;

#### Managers:

- All Managers are responsible and accountable for managing the risk of fraud and corruption;
- Act with integrity, in line with this policy and maintain a working environment that will foster an anti-corruption culture;
- Ensuring that there are adequate, appropriate and robust internal controls in place to make sure all funds, and assets are accounted for and spent in line with VIDEA's aims; Keeping proper and adequate business and financial records for both the receipt and use of all funds;
- Taking any necessary action to protect VIDEA's funds, and assets and to reduce losses to an absolute minimum;
- Acting responsibly within the interests of VIDEA;
- Taking a lead in creating an anti-corruption culture that integrates an anti-oppressive and anti-racist lens, by ensuring all staff and volunteers understand what corruption is and ensuring that staff and volunteers understand the many forms of corruption, including as it relates to the Canadian Government and institutions;
- Deterring, preventing and detecting suspected losses to fraud and corruption;

- Adhere to controls and procedures set to prevent fraud and corruption;
- Reporting any suspicions of fraud and corruption in line with the requirements of this policy;
- Co-operating with investigations as required;
- Understand and comply with this policy.

### **Auditing and Monitoring:**

VIDEA will periodically audit and monitor compliance with this Policy through scheduled, as well as random, anti-corruption compliance assessments and other monitoring initiatives employed by the Board of Directors or other third parties engaged by VIDEA. All VIDEA employees and volunteers are required to attend an induction workshop that includes an introduction to VIDEA's anti-corruption policy.

### **Penalties and Consequences:**

Each VIDEA employee or volunteer is responsible and accountable for adhering to this Policy. Violations of this Policy can result in criminal and civil exposure for VIDEA and each VIDEA employee or volunteer involved, including imprisonment and other severe penalties. In addition to penalties that may be imposed by the laws of the countries where we operate, violations of this Policy may be punished with discipline, up to and including termination, of the VIDEA employee or volunteer and referral for prosecution.

### **An anti-oppressive and decolonial lens:**

VIDEA is committed to applying an anti-racist and anti-oppressive lens to corruption.