



Proud Lebanon

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Anti-Corruption and Anti-Fraud Policy

Purpose

This Anti-Corruption and Anti-Fraud policy outlines the commitment of Proud Lebanon to uphold the highest ethical standards and prevent corruption in all its forms. It aims to establish a framework to prevent, detect, and respond to corruption within the organization and among its stakeholders. It sets forth standards and procedures to promote integrity, accountability, and proper management of resources.

Scope

This Anti-Corruption and Anti-Fraud policy applies to all board members, staff, volunteers, consultants, partners, beneficiaries, suppliers, contractors and any other parties conducting business on behalf of Proud Lebanon or in association with Proud Lebanon.

Definition of corruption

For these purposes of this policy, corruption is defined as the misuse of entrusted power for private gain. It includes, but is not limited to, bribery, fraud, embezzlement, extortion, abuse of power, favoritism, nepotism, and collusion. Corruption involves the improper use of authority or position for personal or organizational benefit.

Core Principles

Recognizing the complex challenges Lebanon faces with corruption, Proud Lebanon is committed to fostering a culture of transparency, accountability, integrity and non-discrimination within the organization and among its stakeholders.

The following principles guide our anti-corruption efforts:

- **Transparency:** We commit to openly communicate financial information, decision-making processes, and program activities to our stakeholders, while respecting confidentiality obligations.



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- **Accountability:** We hold ourselves and our stakeholders accountable for ethical conduct, responsible resource management and adherence to this policy.
- **Integrity:** We pledge to uphold the highest ethical standards in all our interactions, adhering to the utmost moral and professional conduct.
- **Fairness and Non-discrimination:** We treat all stakeholders with fairness, respect and without discrimination, regardless of their background, identity or affiliation.

Prevention measures

Proud Lebanon commits to preventing corruption and fraud through:

- Maintaining transparent policies, procedures and financial records.
- Implementing clear and competitive procurement procedures based on need, quality, and cost-effectiveness.
- Conducting thorough due diligence on partners, suppliers and contractors.
- Ensuring robust budget planning, tracking and oversight.
- Establishing a secure and confidential whistleblowing mechanism (Speak-Up) for reporting suspected corruption without fear of retaliation.
- Instituting clear procedures for reporting suspected corruption, handling reports, conducting investigations, and taking appropriate disciplinary actions.
- Regularly assessing corruption risks and strengthening prevention measures.

Detection and Reporting

- Staff, partners and community members are encouraged to report suspected acts of corruption through the organization's secure and confidential reporting channels (Speak-up mechanism and complaint mechanism).
- Management commits to investigate all reports promptly, fairly and confidentially, while protecting the identity of the whistleblower.
- Anonymous reports must include sufficient information to enable a thorough investigation.



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Compliance and Enforcement

- Compliance with this Anti-Corruption and Anti-Fraud Policy is mandatory for all parties within its scope.
- Violations of this policy will result in disciplinary action, up to and including termination of employment, removal from board membership, or termination of contracts or partnerships.
- Substantiated criminal offenses will be reported to legal authorities for prosecution.

Review and Monitoring

- This policy will be regularly reviewed and updated by the Executive Board to ensure its continued effectiveness and alignment with best practices and evolving legal requirements.
- The Executive Board will monitor the implementation of this policy and receive periodic reports on its enforcement and any corruption incidents.

16/09/2024

