Anti-Corruption Policy

Policy Statement

IRARA is committed to conducting all its activities with honesty, integrity, transparency, and accountability. We adopt a zero-tolerance approach to corruption, fraud, bribery, embezzlement, facilitation payments, and any improper conduct that could undermine public trust, damage our reputation, or breach legal and regulatory requirements.
All individuals acting on behalf of IRARA are expected to uphold the highest ethical standards and comply with this policy, applicable laws, contractual obligations, and donor requirements.

Scope

This policy applies to:

- IRARA Services Limited (UK), IRARA vzw (Belgium), IRARA pvt Limited (Pakistan) and all other subsidiaries and affiliate organisations (collectively "**IRARA**");
- Members of IRARAs' Boards of Directors, officers, management, employees, seconded employees, interns and volunteers (collectively "**Employees**"); and
- Subgrantees, partner organisations, contractors, outside experts, consultants, agents, representatives and any other organisation or individual that acts on IRARAs' behalf or at IRARAs' direction (collectively "**Partners**").

The policy applies in all countries where IRARA operates and to all activities, programmes, projects, procurement, recruitment, fundraising and business dealings.

Responsibilities

Employees must:

- Comply with this policy and complete mandatory anti-corruption training
- Act with integrity at all times
- Declare any conflict of interest
- Report any concerns promptly

Managers must:

- Lead by example
- Ensure compliance within their teams
- Report/handle concerns promptly
- Maintain effective controls

IRARA will:

- Promote a strong anti-corruption culture
- Assess and escalate concerns as necessary
- Ensure appropriate investigations are conducted and suitable outcomes occur

Purpose

The purpose of this policy is to:

- Prevent bribery, corruption, fraud, and unethical conduct
- Promote a culture of integrity and accountability
- Protect IRARA's reputation, assets, and funding
- Ensure compliance with applicable laws and donor requirements
- Provide clear guidance on reporting concerns and suspected wrongdoing

Definitions

Bribery: Offering, promising, giving, requesting, or accepting a financial or other advantage to influence a decision, secure a benefit, or obtain an improper advantage.

Conflict of interest: a situation where a person or their immediate family/friends have a personal, professional or business interest that may conflict with, or appear to conflict with, the best interests of IRARA.

Corruption: The abuse of entrusted power or position for private gain.

Embezzlement: intentional and unauthorised keeping of property or funds by a person who was not authorised to keep them for personal purposes.

False claim: knowingly presenting, or causing to be presented, a false or fraudulent claim for approval and/or payment. This may include failing to correct a mistake if discovering something that makes a claim false.

Fraud: Deliberate deception intended to secure financial, personal, or organisational gain.

Facilitation Payment: An unofficial payment made to secure or expedite routine government or administrative actions.

Theft: the unauthorised taking of any form of property or money.

Prohibited Conduct

No person acting on behalf of IRARA may:

- Offer, give, solicit, or accept a bribe
- Make or receive facilitation payments
- Use organisational funds for improper purposes
- Falsify financial, procurement, or operational records
- Abuse their position for personal gain
- Award contracts, grants, or opportunities based on personal relationships or improper influence
- Conceal conflicts of interest
- Engage in fraud, theft, embezzlement, or misappropriation of assets

Conflicts of Interest

All employees, partners, and representatives must:

- Act in IRARA's best interests
- Avoid situations where personal interests conflict, or could appear to conflict, with organisational interests
- Declare actual, potential, or perceived conflicts of interest promptly

Declared conflicts will be recorded and managed appropriately.

Procurement and Financial Controls

IRARA will maintain appropriate controls to reduce the risk of corruption and fraud, including:

- Segregation of duties
- Multiple approval levels for expenditure
- Competitive procurement processes
- Due diligence checks on suppliers and partners

- Accurate financial records and documentation
- Regular monitoring and audits

No employee may approve transactions from which they personally benefit.

Gifts and Hospitality

Reasonable and proportionate gifts or hospitality may be accepted or provided where they:

- Are lawful and appropriate
- Are not intended to influence decisions
- Are openly declared
- Do not create a conflict of interest or appearance of impropriety

The following are prohibited:

- Cash gifts or cash equivalents.
- Gifts linked to procurement, recruitment, funding, or contract decisions.
- Excessive, lavish, or frequent hospitality.

All gifts or hospitality must be declared and agreement of acceptance must be given in writing by a director before being accepted.

Reporting Concerns

Any individual who suspects any form of corruption must report it immediately to the appropriate person. This might be their line manager, a director or HR.

Reports may be made confidentially and will be investigated appropriately. Failure to report known or suspected corruption may itself be treated as misconduct.

Handling Allegations

IRARA may but are not limited to the following actions:

- Suspend duties pending investigation where necessary
- Refer matters to statutory agencies
- Refer individuals to professional or regulatory bodies
- Take disciplinary action up to and including dismissal
- Suspend or stop contract/s

Breaches of Policy

Failure to comply with this policy may result in disciplinary action, up to and including dismissal where appropriate, termination of contracts or partnerships, recovery of losses and/or reporting to relevant authorities.

This policy is reviewed regularly to ensure it remains compliant and aligned with best practice.