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Anti-Fraud and Corruption Policy

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Compliance requirement: Mandatory

1. INTRODUCTION:

Terre des hommes (hereinafter referred to as Tdh) is committed to transparency in its activities and transactions, especially in the negotiation and execution of its contracts with donors and suppliers, in the management of its human resources and in the implementation of institutional and operational projects.

Fraud and Corruption can be particularly harmful when resources are diverted from the most vulnerable populations, we are committed to serve. Fraud and Corruption can jeopardize the organization's ideals regarding integrity and ethics, its effectiveness as well as the proper management of the funds allocated to the conduct of our mission towards the beneficiaries and can cause serious legal, operational, financial, and reputational damage.

2. PURPOSE:

This policy is to define prohibited behaviours, describe Fraud and Corruption and provide guidance and assistance in recognizing and reporting Fraud and Corruption.

3. STATEMENT:

Tdh adopts a **zero-tolerance** approach to Fraud or Corruption and is committed to respecting the highest standards of integrity in all its locations by implementing and enforcing efficient systems to counter Fraud and Corruption.

4. APPLICABILITY:

This policy is applicable to:

- All Tdh employees, at all levels (this includes volunteers, interns, apprentices, consultants).
- Any individual or entity working on behalf of Tdh in all its locations (this includes implementing partners depending on clauses and conditions stipulated in the agreement).
- Any individual or entity carrying work for Tdh in all its locations (this includes contractors, agents, and suppliers).

5. RESPONSIBILITY:

All Tdh employees, at all levels, must understand the definitions of Fraud and Corruption and conduct their work in the most ethical manner. All individuals and entities listed in Section 4 of this Policy must report any instance of, or suspicion of Fraud and Corruption, in line with Section 7 of this Policy.

6. DEFINITIONS:

FRAUD is defined as a misrepresentation or concealment of material facts with the intent to deceive and obtain an unauthorized benefit such as money, property, or services.

Fraud can be in different forms, its most typical are:

- **Theft:** The theft of funds or any other element of Tdh property, whether tangible or intangible. Examples of Tangible property can include, but is not limited to, assets, stocks, vehicles etc. Examples of Intangible property can include, but is not limited to, suppliers list, contact list, valuable information, etc.
- **Fraudulent/inaccurate information and/or documentation:** The falsification or creation of a false document or entries, misuse of signatures, manipulation, destruction, or disappearance of accounting documents.

- **False representation:** This is the act of knowingly giving incorrect information or claims, that are not true and are misleading, made to gain an advantage (financial, reputational, operational, or legal).
- **Misuse of Property, Funds and Assets:** This can be the personal appropriation of Tdh property or misappropriation of funds, assets or anything that is Tdh property. To note that property can be tangible and/or intangible.

CORRUPTION is the abuse of entrusted power for private or political gain.

Corruption can be found in different forms, its most typical are:

- **Bribery:** Bribery is offering, promising, giving, soliciting, or accepting any financial or other advantage, to persuade the recipient or any other person to act improperly. An advantage includes money, job offer, services, gifts, hospitality and the award of a contract or anything else of value.

Under this policy:

- a. No gift or hospitality, regardless of the value, can be given to or received from any government officials/employees or from any supplier in an active bid process.
- b. Tdh accepts the giving or receiving of **non-cash gifts and hospitality of small monetary value, also referred to as a nominal value**. Examples of non-cash gifts or hospitality of nominal value are greeting cards, small plants, cups, and invitations to meals (as long as they are within casual range) used only for business purposes and not for influential purposes.
- c. In case non-cash **gifts and hospitality of more than a nominal value** are sent to Tdh staff/offices during celebrations, events, holidays or per tradition/customs, then those should be declared to the HR Department. The gift cannot be received by the intended individual(s) and should be placed in common areas, for everyone's use.
- d. The provision of **gifts or hospitality of more than a nominal value** is prohibited. Any attempt of a gift or hospitality of more than a nominal value with the intention of persuading or influencing anyone to act improperly is considered to be a type of bribery.

If you are unsure whether a gift or hospitality is accepted or prohibited, please contact your direct manager before making or accepting any such gift or hospitality.

- **Conflict of Interest:** Conflicts of interest arise when your position or responsibilities at Tdh presents an opportunity for benefit, profit or personal gain for you or your immediate family, or when your interests or loyalties may be different from those of Tdh.

A Conflict of interest can be actual or can be potential. If an interest can affect your judgment or interfere with your duty to act in the best interests of Tdh, then there is a conflict and it can potentially lead to improper behavior such as **nepotism, abuse, favoritism, unfair selections, procedural violations, and other types of misconduct**.

**Read Tdh Conflict of Interest Policy for more information on Conflict of interests and disclosure requirements.*

- **Extortion:** It is the act of utilizing, either directly or indirectly, one's access to a position of power or knowledge to demand unmerited cooperation or compensation as a result of coercive threats.

7. REQUIREMENTS:

All individuals and entities listed in Section 4 of this Policy must report any instance of, or suspicion of Fraud and Corruption. Tdh has **zero-tolerance** approach towards Fraud and Corruption and commits to deploy all necessary measures to address such reports.

Whistle-blower protection: Tdh will protect anyone who reports suspected misconduct in good faith from negative action taken against them and will not tolerate any form of retaliation against whistle-blowers and reporters.

Any staff who suspects, witnesses and/or receives an allegation of suspected misconduct must immediately transmit the allegation by:

- Sending an e-mail to Tdh internal reporting channel: concern@tdh.org
- Filing an allegation (which can be anonymous) at: <https://concern.tdh.org>
- By contacting the Global Ethics and Compliance Office directly.

Any allegation received will be handled by the Global Ethics and Compliance Office according to its Incident Management Protocols.

Failure to report consists in misconduct and will result in disciplinary action up to and including termination.

To note that any reporting made in bad faith (malicious reporting), when substantiated, will be met with disciplinary measures, as applicable.

8. SANCTIONS:

Tdh reserves the right to impose disciplinary sanctions, in accordance with the personnel regulations in force in the country of operation, up to and including termination.

9. ANNEXES:

This policy is accompanied by 03 annexes that support a better understanding of this policy.

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has the right to a childhood.
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