



IWGIA

INTERNATIONAL WORK GROUP FOR INDIGENOUS AFFAIRS

IWGIA ANTI-CORRUPTION POLICY

IWGIA maintains a policy of zero tolerance towards corruption in all its forms.

The guiding principle is to place high demands on professional ethics as well as on the integrity of each individual and organization - both internally towards ourselves and externally towards our partners and subcontractors.

The target group for this code is IWGIA's employees, subcontractors, and partners, both in Denmark and abroad, including their staff and volunteers.

This Code will/should/is supplemented by existing, and if relevant, new guidelines aimed at specific areas of IWGIA's work.

As IWGIA undertake the administration of donor funds subject to Danida's, NORAD's and EC's guidelines, the highest standard prevails.

The purpose of this Code is to:

- *Ensure that all IWGIA employees work responsibly and with a high degree of integrity and are able to inform business partners about expectations, duties and responsibilities.*
- *Ensure that all parties involved in IWGIA projects work responsibly and with a high degree of integrity both as individuals and as organizations.*
- *Outline the countermeasures to be taken in case of suspicion or certainty of fraud, abuse or serious irregularities related to cooperation with IWGIA.*

CORRUPTION:

This Code aligns with the internationally recognised definition of corruptions as **“the misuse of entrusted power for private gain”**¹

Corruption includes, but is not limited to the following actions:

- Fraudulent behavior refers to deliberate acts committed by management or other trusted persons for their own gain. This includes, extortion, conspiracy, secret agreements, scams, nepotism, theft, embezzlement, document forgery as well as misleading or fraudulent reporting of costs associated with project activities, travel expense-padding, misinformation on per-diems or diets, etc. It is imperative to demonstrate zero tolerance for all types of fraud.
- Bribery is corrupt behavior and practice when supplementary payment is offered in addition to normal rates in exchange for special services or accelerated processing, sometimes referred to as kickbacks.
- Misuse of funds, understood as the use of money or resources (such as computers, audio-visual equipment, cars, telephones, etc.) for purposes other than those outlined in project documents, and as negligent or inappropriate maintenance of assets.
- Inadequate accounting, delayed or non-financial reporting to partners and donors, waste in the management of material, financial and human resources, and other forms of management failure.
- Employees at IWGIA may offer or be offered gifts from time to time as a token of gratitude in observing and respecting local hospitality conventions. Such gifts must never present a value that in any way could affect impartiality. In the context of corruption, a gift is a financial or other benefit, offered, given, solicited or received in the *expectation* of receiving a benefit in return.

COMPLIANCE

Compliance with relevant laws, regulations, and international conventions is always expected from IWGIA's employees, subcontractors, and partners.

Partners and subcontractors are also expected not to support any individual or entity that it knows or has reason to know advocates terrorism and/or engages in terrorist activity in violation of applicable law.

¹ The [Anti-Corruption Policy](#) of the Danish MFA



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ACTIONS

IWGIA expects our partners, suppliers, and subcontractors to maintain and comply with written codes of conduct, and/or policies and procedures that protect against any form of fraud and corruption, bribery, kickbacks, conflicts of interest, as described above.²

Everyone has the right to report any irregularities or unacceptable circumstances. IWGIA's employees further have a duty to notify of any circumstances that could cause loss or injury to IWGIA, the Donors, employees or the surroundings. Any instance of actual or reasonably suspected fraud or corruption related to IWGIA's work must be reported. IWGIA expect employees, partners and suppliers to fully cooperate with any investigation IWGIA, in its discretion, or the Donor, may require.³

When entering into any agreement with IWGIA, the partner, subcontractor or supplier accepts, and agrees to add in contracts and agreements with sub-suppliers and partners the following corruption clause:

"No offer, payment, consideration or benefit of any kind, which constitutes illegal or corrupt practise, shall be made, either directly or indirectly, as an inducement or reward in relation to tendering, award of the contract or execution of the contract. Any such practise will be ground for the immediate cancellation of this contract and for such additional action, civil and/or criminal, as may be appropriate."

² If no such written policies are in place, follow the [Anti-Corruption policy of the Danish Ministry of Foreign Affairs](#)

³ [Danish MFA Reporting Channel on Corruption](#)