

Anti Corruption Policy

APPLICATION

As a Global Policy, this policy applies to:

- a. CAP International, including its headquarters in France, and all of its potential country offices, regional offices, liaison offices, and any other offices;
- b. All National Organisations that have signed a Members' Agreement with CAP International;
- c. All other entities that agree to be bound by the Global Policies.

The principles and definitions in this policy also extend to relationships CAP International has with third parties (including, without limitation, implementing partners, contractors and donors).

All the above-mentioned actors have the obligation to report alleged corruption acts to CAP International's Ethics Committee, in accordance with the provisions of this Anti-Corruption Policy.

WHAT IS CORRUPTION ?

CAP International endorses Transparency International's definition of corruption :

Corruption is « ***the abuse of entrusted power for private gain.** Corruption can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.*

This definition is not limited to interactions with public officials and covers both attempted and actual corruption, as well as monetary and non-monetary corruption. Examples of the forms corruption takes include, but are not limited to: facilitation payments, bribery, gifts constituting an undue influence, kickbacks, favouritism, cronyism¹, nepotism, extortion, embezzlement², misuse of confidential information, theft, and various forms of fraud, such as forgery or falsification of documents, and financial or procurement fraud.

ZERO TOLERANCE TOWARDS CORRUPTION

The Coalition for the Abolition of Prostitution (CAP International) is an advocacy vehicle for frontline NGOs and a global convener for change. Its ultimate goal is to achieve the abolition of prostitution.

At CAP International, we believe that we must conduct our actions in an ethical, honest and transparent manner. Our commitment is based on human rights principles, including the principles of international human rights law.

In addition, CAP International considers corruption as highly incompatible with its identity, mission and objectives, considering corruption as part of the criminal eco-system that favours the development of prostitution and trafficking in human beings.

Therefore, CAP International has a **zero tolerance policy towards corruption.**

Zero tolerance means that CAP International does not tolerate corruption in relation to any of its actions. CAP International will take all suspicions of corruption seriously and assess, act upon, investigate and discipline all such cases as appropriate and in a professional, transparent and fair

¹ « Cronyism » is the appointment of friends or associates to positions of authority, without proper regard to their qualifications

² « Embezzlement » is the theft or misappropriation of funds placed in one's trust or belonging to one's employer

manner. Compliance with this policy is mandatory for staff, implementing partners, contractors and related Third Parties. Failure to do so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with CAP International.

CAP International furthermore reserves the right, without prejudice to any other right or remedy available to it, to take such additional action, civil and/or criminal, as may be appropriate.

PRESERVING CONFIDENCE AND RELIABILITY

CAP International works with the support of its public and/or private partners and donors, who provide the vital resources to perform CAP International's mission. CAP International has an obligation towards these partners and donors to ensure that these means and CAP International's activities are not subject to corruption. All staff, as well as all others working with CAP assets, therefore have a responsibility to ensure that corruption is prevented in CAP activities.

INTERNAL ANTI-CORRUPTION PRACTICES

CAP International has a zero tolerance for corruption in all its forms. Staff members are prohibited from engaging in corrupt activities, both in their work and in their private life. Failure to comply will result in disciplinary action, including the possibility of termination of employment.

CAP International and staff are committed to staying accountable and transparent, to upholding CAP International's values and integrity, to following formal procedures, and to safeguarding its entrusted means.

- Everyone subject to this Anti-Corruption Policy has the obligation to bring forward any related issues, questions, doubts or concerns to CAP International's Ethics Committee.
- To report any corruption practice or suspicion, a Corruption Report Form has to be filled and sent by email to the Ethics Committee (ethicscommittee@cap-international.org). The Corruption Report Form and reporting mechanism are available freely on CAP International's website.
- CAP International is committed to ensuring that everyone subject to this Anti-Corruption Policy understands the consequences of violating the policy and their duty to report to the Ethics Committee all suspicions of corruption thought to be in breach of this policy.
- CAP International is committed to using transparent, straightforward and clear procedures, monitoring, checks and balances and documentation in order to avoid corruption in its work.
- CAP International is committed to avoiding conflicts of interest.
- CAP International is committed to ensuring that any representation or hospitality promised, given or received is modest, occurs within a standard business framework and aligns with donor regulations. Representation and hospitality must never compromise CAP International's integrity, neutrality, policies and guidelines, or otherwise exert or attempt to exert an undue influence on any party.
- Staff members are prohibited from promising, offering, giving, seeking or accepting personal gifts or other advantages representing more than token value to or from persons of concern, donors,

implementing partners, suppliers, authorities or other CAP International' stakeholders. Any gift(s) constituting an attempt to exert an undue influence on any staff or stakeholder are strictly prohibited. Staff involved in partner, member and beneficiary selection will exert enhanced caution in this regard. All cash gifts are strictly prohibited.

- CAP International strictly prohibits the promising, offering, giving, seeking or accepting of representation, hospitality and gifts for staff involved in the procurement process.

ADDITIONAL RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

Managers and supervisors must also:

- Model appropriate standards of behaviour;
- Take steps to educate and make staff aware of their obligations under this policy and the law;
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard and help staff resolve complaints informally when relevant ;
- Ensure staff who raise an issue or make a complaint are not victimised.

ANTI-CORRUPTION POLICIES TOWARDS RELATED EXTERNAL STAKEHOLDERS

Related external stakeholders are the beneficiaries, partners, members and contractors CAP International works with.

- CAP International is committed to ensuring that its related external stakeholders, understand and comply with this Anti-Corruption Policy in terms of the standards and behaviour the policy demands of them, as well as the consequences of breaching it, up to and including the possibility of termination of the violating party's contract, membership and/or relationship with CAP International.

- CAP International is committed to preventing its related external stakeholders from falling victim to corruption.

- CAP International is committed to excluding a given person or organisation from receiving CAP International's benefits when it is determined that that person has only obtained access to such benefits through corrupt means and is otherwise not entitled to them.

- CAP International is committed to promoting awareness and use of its complaints and reporting mechanisms and to ensuring that all CAP International's related external stakeholders have safe, easy and trusted access to report suspected corruption in confidence.

REPORTING AND INVESTIGATIONS

- CAP International is committed to taking all reported suspicions of corruption seriously and assessing, acting upon, investigating and sanctioning all such cases as appropriate and according to professional, transparent and fair procedures.

- CAP International is committed to protecting reporting persons' confidentiality and rights, and does not tolerate retaliation against reporting persons. The Ethics Committee guarantees the confidentiality of the report and the identity of the complainant.
- CAP International considers knowingly making a false report of corruption to constitute a violation of this policy. Doing so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract, membership and/or business relationship with CAP International.
- CAP International will seek to recover any assets lost due to corruption.
- CAP International is committed to meeting its obligations to report instances of corruption to relevant donors and to external authorities as appropriate.

COMPLIANCE AND CORRUPTION RISK MANAGEMENT

- CAP International is committed to knowing and understanding the Anti-Corruption laws and regulations applicable to its projects and the areas where it operates. CAP International and its staff will comply with the laws of the countries in which they are located as well as the rules and regulations of its donors and applicable international Anti-Corruption legislation and conventions.

When local law sets lower standards than CAP International's Anti-Corruption Policy or administrative procedures, these internal procedures are to be used to the extent that they do not directly conflict with local law.

- CAP International will learn from corruption cases, take corrective action and adjust its culture and practices accordingly in order to better prevent future cases and ensure compliance.
- CAP International's management will review the Anti-Corruption Policy implementation annually with respect to legal and regulatory developments and to ensure compliance and best practice.
- CAP International is committed to preventing corruption by systematically assessing and reviewing corruption risks in its work according to its Risk Management Framework. CAP International can thereby design its interventions and mitigating measures according to these risks, also as they may relate to external parties, such as implementing partners, members, contractors and related Third Parties.