

## Anti-Corruption Policy of Coalition Clean Baltic – CCB

CCB has, as a non-profit organization active in international cooperation, a responsibility to at all stages actively prevent and act against corruption within the organization and in the member's countries.

*CCB commits to a policy of zero-tolerance of corruption in any form.*

This should be reflected in both the employees as well as in the CCB's representatives' actions. CCB's anti-corruption policy is based on the following key statements:

- CCB's employees and representatives must handle responsibilities, entrusted financial and material assets under the accountability to members, donors and taxpayers.
- CCB's employees and representatives shall not use their position in CCB to create any kind of personal gain or improper gain for a third party.
- CCB's employees and representatives shall in connection with visits to partner organization or in dealings with suppliers, where a financial relationship exists, not accept gifts or other benefits. If smaller gift should be received as cultural traditions may call for, the gifts should as a rule be submitted to the whole CCB Council or staff as appropriate. The limit value of a gift cannot exceed [20 euros].
- CCB's employees and representatives shall not engage in activities, groups etc. with the intent to achieve personal gain and thus improperly exploit CCB's reputation.
- Each Council Member and employee shall in a specially designed document (Appendix 1), agree to comply with this policy whose motive, purpose and implementation etc. are developed in the following.

### 1. Introduction

CCB is the largest member-based environmental organization in the Baltic Sea Region. The Coalition's ability to act as a voice of civil society concerned about the regional environmental problems depends upon confidence and trust. Corruption undermines the very idea of a non-profit organization and it cannot be tolerated.

The reputational impact for an NGO that is linked to a corruption case, bribery prosecution, or even just an investigation, could be very damaging. It may deter potential donors and may jeopardize the NGO's ability to participate in policymaking.

Corruption leads to inefficient use of resources, impairs development and is ultimately a contributing factor to the unequal distribution of income and wealth in many countries. Corruption renders harmful effects on society, economy and prosperity, its institutions, companies and organizations can also damage people's faith in democracy, rule of law and human rights. Corruption created by the abuse of power is very difficult to control if allowed to spread in a society. Residents in a country with widespread corruption are exposed to a much greater extent of abuse and violations of their human rights. In the worst cases, individuals who refuse to accept bribes or work against corruption can be threatened or murdered.

The knowledge of what citizens should expect from agencies and countries' politicians and governments

creates the conditions for civil society to act as active fighters against corruption, as "watchdogs" and "whistle-blowers". All taxpayers in all countries have the same interest in monitoring the sound management of public funds and expose corruption in the society.

## 2. Aims and objectives

The policy is meant to:

- Prevent and/or detect the cases of corruption or bribes and to provide a clear message to staff, members, partners and other stakeholders that corruption will not be tolerated;
- Describe how the Council and staff of CCB should relate and act to suspicions of corruption;
- Ensure donors that the promised results are achieved in the most efficient manner, minimizing the risk of misusing the resources by preventing corruption;
- Amend, complement and integrate the anti-corruption provisions across CCB policies and routines (incl. Code of Conduct, Procurement Guidelines, Financial Manual) to improve our ability of influencing policy makers, funders and stakeholders

## 3. Definitions and Scope

Corruption is defined by the organization Transparency International as the "abuse of entrusted power for personnel gain". (more definitions in the Appendix 2)

Corruption is usually considered to exist when someone uses their position of power to benefit themselves, e.g. the decision makers in public administration or a purchasing manager in business. It can also be about promoting an interest close to the decision-maker, e.g. a politician who receives a contribution to his party for the promise to work for a certain political decision. Corruption is usually not a legal concept. In Swedish and foreign legislation, the criminal area with offenses such as corruption are specified as bribery, breach of trust, swindling, fraud, forgery, embezzlement, conflicts of interest, illegal financing of political parties, misconduct etc.

Corruption thus includes a criminal offense and can occur both at the Swedish organization, in a partner organization or in dealing with suppliers and with the public administration.

An anti-corruption policy is based on the prevention of corruption as a cross-cutting issue that should permeate all the contexts where CCB is operator and where financial resources and/or power and influence at both the individual and organizational levels are involved.

## 4. Specific Provisions

### 4.1. Conflict of Interest

A conflict of interest situation arises when the "private interests" of the staff compete or conflict with the interests of the organization. "Private interests" means both the financial and personal interests of the staff or those of their connections including:

- family and other relations;
- friends;
- the organizations, associations and societies to which they belong;
- any person to whom they owe a favour or are obligated in any way.

The conflict of interests is an actual or potential conflict between a Council member or a staff member and the CCB principles and values. There is a potential conflict in any situation in which questions might be raised whether a decision was made solely for the benefit of the CCB and to advance the cause of conservation, or whether there were competing concerns, most notably gain or favour for an individual associated with the CCB, his or her family, or organizations related to such persons.

Any Council member or member of staff who has an actual or perceived conflict of interest with the CCB shall notify the Co-Chairs and the Council of such conflict in writing.

Staff and members should avoid using their official position or any information provided to them in the

course of their duties to benefit themselves, their relationships or others with whom they have personal or social ties.

Staff and members should not put themselves in a position that could lead to a real or perceived conflict of interest with the organization.

Failure to avoid or declare any conflict of interest may give rise to criticism of favouritism, abuse of authority or even allegations of corruption.

In particular, staff and members involved in the procurement process should declare conflict of interest if they are closely related to or have beneficial interest in any company which is being considered for selection as the supplier of goods or services.

Below you find some examples of conflict of interest situations which may be encountered by staff and members.

- An employee takes part in the selection of suppliers or contractors, one of the bidders under consideration being his family member, relative or close friend.
- An employee or a member has a financial interest in a company which is being considered for selection as the supplier of goods or services.
- An employee or a member accepts frequent or luxurious entertainment or expensive gifts from the suppliers or contractors.
- An employee or a member is involved in a recruitment process where one of the candidates is his/her family member, relative or close friend.
- An employee or a member responsible for processing applications for funding is considering an application from his/her family member, relative or friend.

When such situations arise a staff member should make a declaration in writing and abstain from dealing with the matter in question or follow the instruction of his/her supervisor who may reassign the task to other staff.

To prevent conflict of interest, each staff, Council and Working Area Leader and Working Group Coordinator, confirms their engagements with any other entities on an annual basis using the Registry of Engagements

#### ***4.2. Misuse of Official Position***

Staff or a member who misuse their official position for personal gains or to favour their relatives or friends are liable to disciplinary action or even prosecution. Examples of misuse include a person who is responsible for the selection of suppliers giving undue favour or leaking tender information to his/her relative's company with a view to awarding the contract to the latter.

#### ***4.3. Acceptance of Advantages***

CCB prohibit all staff and members from soliciting any advantage from any persons having dealings with the organization (e.g. members, partners, suppliers, contractors). Staff and members who wish to accept any advantage from such persons should seek special permission from the Council.

Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to the organization and they should not be accepted without permission. Staff should decline the offer if the acceptance could affect their objectivity in conducting the work, or induce them to act against the interest of the organization, or lead to complaints of bias or impropriety.

For gifts which are presented to staff in their official capacity and of nominal value (below [20 euros]), the refusal of which could be seen as unsociable or impolite (e.g. a present presented to a staff member during a seminar in which he is invited to be the guest speaker), the Council has given a blanket permission for the staff to accept these gifts. In other circumstances, the staff should apply in writing to the Council for permission to accept the gifts. Each application should be carefully considered by the Council or other staff member who is delegated the authority to consider such applications.

Proper records of these applications should be kept showing the name of the applicant, the occasion of

the offer, the nature and estimated value of the gift, and whether permission has been granted for the applicant to retain the gift or other directions have been given to dispose of the gift. Possible ways of disposal of such gifts are listed below.

Ways to dispose of gifts presented to a staff member in his official capacity:

- If the gift is of perishable nature (e.g. food or drink), it may be shared among the office or during an activity.
- If the gift is a useful item, it may be sent to a charitable organization
- If the gift is of historical or other interest, it may be sent to a library or museum.
- If the gift is suitable for display (e.g. a painting, vase, etc.), it may be retained for display in the CCB's office or elsewhere in the organization.
- If the gift has a low value (less than [20 euros]), it can be donated to the social function of the organization as a prize/lottery.
- If the gift is a personal item of low value (less than [20 euros]), it may be retained by the recipient.

There is however no restriction on the acceptance of advantages, in the staff's private capacity, from any person who does not have any official dealings with the organization. In case of doubt, the staff should refer the matter to the Controller or Financial Officer for advice and instruction.

#### **4.4. Entertainment**

"Entertainment" refers to food or drink provided for immediate consumption on the occasion, and any other entertainment provided at the same time. Although entertainment is an acceptable form of social behaviour and is not an "advantage", staff or members must not accept luxurious or frequent entertainment from persons with whom the organization has official relations (e.g. partners, suppliers or contractors), so that they will not be placed in a position of obligation.

#### **4.5. Handling of Sensitive or Confidential Information**

Staff and members are not allowed to disclose any information which considered as sensitive or confidential to anybody without authorisation.

Staff and members who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include unawareness of the risks connected with information expose, disclosure of information in return for monetary rewards, or use of information for personal interest.

It should also be noted that unauthorised disclosure of any personal data may result in a breach of the General Data Protection Regulation (GDPR) with the risk fines and damage to the reputation.

#### **4.6. Property of the Organization**

Staff and members given access to any property of the organization should ensure that it is properly used for the purpose of conducting the organization's work. Misappropriation of the organization's property for personal use or resale is strictly prohibited.

### **5. Corruption Prevention**

A basis for corruption prevention is an awareness of the risk of corruption and its harmful effects. Through information and education the CCB Council, members and staff shall have a good knowledge of the phenomenon of corruption, and learn how these risks will be prevented, actively fought and how suspicion of corruption should be handled. As part of the global anticorruption efforts such awareness shall also be promoted in CCB's partner organizations.

The Executive Secretary shall ensure that the CCB's anticorruption policy and guidelines for the work that the Council determined is known by all employees, and ensure that it is applied.

Each employee and member is required to learn and follow the guidelines and procedures laid down for the prevention of corruption as attestation instruction, procurement policy, confidentiality, procedural system for payment of aid to partner organizations, reconciliation procedures, rules for budgeting, financial reporting and monitoring etc.

## 6. Suspicion of corruption and reporting

CCB's Council, members and staff must be alert and report possible violations of the laws, policies and suspected corruption within their own organization and contribute to CCB constantly improving its own systems and routines to prevent corruption. If someone has a reason to suspect impropriety within the CCB's activities, we kindly ask them to make a report. They are entitled to anonymity.

*The aim of the Hot Channel is to detect and mitigate potential cases of misconduct and to ensure that CCB as a network and its members behave ethically and in compliance.*

*The Hot Channel will address the following tasks:*

- Expose Fraud
- Decrease Corruption
- Encourage Whistleblowing
- Promote Ethics & Compliance
- Reduce Harassment
- Eliminate Discrimination
- Address Bullying
- Ensure Personal Safety

The person in question has the right to choose whom within CCB he / she turns in with the report. In the first instance, a report of suspicion can be made to the Manager, the Finance Officer, the Controller or to the Executive Secretary. Alternatively, the Co-Chairs or chosen Treasurer of the Council can receive the report, but the person in question also has the right to turn to someone else within the CCB who has a mandate to act.

The person / persons receiving the report is obliged to investigate the matter and if violations are discovered, take the necessary measures. If the report turns out to be unfounded, this should not put the complainant to blame. Both a justified and unjustified notification are covered by the right to anonymity protection.

The core principles for handling reports of concerns are:

- Fair and objective process
- Protection of the whistleblower against retaliation
- Ensuring the legal rights of the individual who is the subject of the report
- Confidentiality
- Protection of sources
- Protection of personal data

While CCB encourages you to provide your name so that we can be sure to get all the information necessary for an investigation, you may remain anonymous.

Please, report [here](#).

The suggested channel is placed on CryptPad, which is a collaborative office suite that is end-to-end encrypted and open-source. It uses encryption so that the service's administrators have no access to the content of the files we store.

*For all who apply through this channel CCB guarantees:*

- a safe channel to speak up in confidence either anonymously or by name
- that those who speak up will be listened to and supported
- confidential space for everyone to speak up internally without fear of retaliation
- a trusted channel to report concerns about safety or wellbeing
- that investigators can continue the conversation with a whistleblower while preserving their

anonymity if they so choose

- an internal reporting process ensures that any form of misconduct will not be tolerated
- appropriate actions will be taken and retaliation is not tolerated
- misuse of the information posted in this channel, such as wrongfully sharing the information or attempts to influence the whistleblower, might be sufficient grounds for termination of a work contract or membership.

The information you send to the Hot channel will be reviewed and needed actions taken in cooperation with legal and thematic experts.

The person/persons receiving notification is required to examine the substance of the notification and when adequate take the necessary measures. If the application proves to be unfounded, this does NOT give cause to disfavor the notifier.

#### *The algorithm of handling reports:*

The reports are collected by the external company which follows the agreed procedure.

*If the Executive Secretary is mentioned, the investigation will be brought to the Council first. If the Co-Chairs is mentioned, the investigation will be brought to the Vice-chair.*

*If one or several Council members are mentioned, the investigation will be brought to the Co-Chairs.*

*If an employee is mentioned, the investigation will be brought to the Executive Secretary.*

*If one of the member organizations/observers is mentioned, the investigation will be brought to the Council.*

*If one of the CCB's partners but not members is mentioned, the investigation will be brought to the Executive Secretary.*

The person or organization who is mentioned in the report will not receive the report initially. After the investigation each case will be reported to the Council.

Whether legitimate or illegitimate notification, in both cases the notifier has the right to complete anonymity.

## **7. Responsibility and follow-up**

The Executive Secretary is responsible to the Council for developing, monitoring and improving the CCB internal governance and control, and shall ensure that induction training for new staff includes information on anti-corruption work. The Council has the ultimate responsibility to its members and the outside world for anti-corruption work. The Council shall be informed of the work of the Executive Secretary.

## FORM FOR SIGNATURE

### Declaration of conformity with CCB Anti-Corruption Policy

CCB commits to a policy of zero-tolerance of corruption in any form, which is reflected in staff and CCB's representatives' actions.

The policy means the following:

- CCB's employees and representatives must handle responsibilities, entrusted financial and material assets under the accountability to members, donors and taxpayers.
- CCB's employees and representatives shall not use their position in CCB to create any kind of personal gain or improper gain for a third party.
- CCB's employees and representatives shall in connection with visits to partner organization or in dealings with suppliers, where a financial relationship exists, not accept gifts or other benefits. If smaller gift should be received as cultural traditions may call for, the gifts should as a rule be handed over to the whole CCB Council or staff as appropriate. The limit value of a gift cannot exceed [20 euros].
- CCB's employees and representatives shall not engage in activities, groups etc. with the intent to achieve personal gain and thus improperly exploit CCB's reputation.
- Each Council member and employee shall in a special document undertake to follow this policy whose motives, purpose and implementation, etc. are developed in the following.

The undersigned has taken note of the CCB's anti-corruption policy and promises to follow it.<sup>1</sup>

Date

Signature

Name

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<sup>1</sup> Signed form to be kept in the CCB digital archive.



## Glossary (Definitions by Transparency International)

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**Accountability** - The concept that individuals, agencies and organizations (public, private and civil society) are held responsible for executing their powers properly.

**Audit** - An internal or external examination of an organization's accounts, processes, functions and performance to produce an independent and credible assessment of their compliance with applicable laws, regulations and audits.

**Bribery** - The offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organization's activities. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, etc.).

**Clientelism** - An unequal system of exchanging resources and favors based on an exploitative relationship between a wealthier and/or more powerful "patron" and a less wealthy and weaker "client".

**Code of Conduct** - Statement of principles and values that establishes a set of expectations and standards for how an organization or individual will behave, including minimal levels of compliance and disciplinary actions for the organization, its staff and volunteers.

**Compliance** - Refers to the procedures, systems or departments within public agencies or companies that ensure all legal, operational and financial activities are in conformity with current laws, rules, norms, regulations and standards.

**Conflict of Interest** - Situation where an individual or the entity for which they work, whether a government, business, media outlet or civil society organization, is confronted with choosing between the duties and demands of their position and their own private interests.

**Corruption** – The abuse of entrusted power for private gain.

**Disclosure** - Provision of information as required under law or in good faith, regarding activities of a private individual, public official, company or organization. Information can include a political candidate's assets, a company's financial reports, an NGO's donors or a whistleblower's accusations.

**Embezzlement** - When a person holding office in an institution, organization or company dishonestly and illegally appropriates, uses or traffics the funds and goods they have been entrusted with for personal enrichment or other activities.

**Ethics** - Based on core values, a set of standards for conduct in government, companies and society that guides decisions, choices and actions.

**Extortion** - The unlawful use of one's position or office to obtain money through coercion or threats. One example would be when customs officials request illegal "customs fees" from importers as a condition to clear their goods.

**Facilitation payments** - A small bribe, also called a 'facilitating', 'speed' or 'grease' payment; made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.

**Fraud** - To cheat. The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise). Countries consider such offences to be criminal or a violation of civil law.

**Gifts and hospitality** – These can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays etc). Extravagant gifts and hospitality may be used to disguise bribes that are intended to induce improper behavior.

**Integrity** - Behaviors and actions consistent with a set of moral or ethical principles and standards,



embraced by individuals as well as institutions, that create a barrier to corruption.

**Lobbying** - Any activity carried out to influence a government or institution's policies and decisions in favor of a specific cause or outcome. Even when allowed by law, these acts can become distortive if disproportionate levels of influence exist — by companies, associations, organizations and individuals.

**Money Laundering** - The process of concealing the origin, ownership or destination of illegally or dishonestly obtained money by hiding it within legitimate economic activities.

**Nepotism** - Form of favoritism based on acquaintances and familiar relationships whereby someone in an official position exploits his or her power and authority to provide a job or favor to a family member or friend, even though he or she may not be qualified or deserving. Also see "clientelism".

**Patronage** - Form of favoritism in which a person is selected, regardless of qualifications or entitlement, for a job or government benefit because of political affiliations or connections.

**Procurement** - A multi-step process of established procedures to acquire goods and services by any individual, company or organization — from the initial needs assessment to the contract's award and service delivery.

**Solicitation** – The act of a person asking, ordering or enticing someone else to commit bribery or another crime.

**Transparency** - Characteristic of governments, companies, organizations and individuals of being open in the clear disclosure of information, rules, plans, processes and actions. As a principle, public officials, civil servants, the managers and directors of companies and organizations, and Council trustees have a duty to act visibly, predictably and understandably to promote participation and accountability.

**Whistleblowing** – The sounding of an alarm by an employee, director, or external person, in an attempt to reveal neglect or abuses within the activities of an organization, government body or company (or one of its partners) that threaten public interest, its integrity and reputation.