

Adoptionscentrum's policy against corruption

This anti-corruption policy applies to all of Adoptionscentrum's operations: adoption mediation, member activities, information work and international development cooperation. This policy is to be applied by everyone active in the organisation, both in Sweden and abroad.

Definition of corruption

Adoptionscentrum defines corruption as an abuse of trust, power or position that entails improper gain. This includes offering and receiving bribes, blackmail, favouritism, nepotism, swindle, disqualification/conflict of interest, and embezzlement.

Adoptionscentrum's attitude to corruption

Adoptionscentrum works to avoid and combat the existence of corruption within its own operations and to contribute, through its activities, to combating corruption in the countries and the contexts where the organisation operates. Adoptionscentrum shall actively prevent corruption by identifying, drawing attention to, and taking into account risks of corruption in all its operations. To make this possible, all employees and elected representatives in Adoptionscentrum shall be informed about the anti-corruption policy and apply it. This application entails that the employees and elected representatives shall clarify Adoptionscentrum's policy on corruption for Adoptionscentrum's partners as well as being vigilant and observing and reporting suspected corruption in activities.

Adoptionscentrum's attitude to corruption is to:

- **Never accept**
- **Always act**
- **Always inform**

Adoptionscentrum has a duty to inform the financier or authority concerned in the event of suspected corruption in its operations.

Code of Conduct against corruption

- Adoptionscentrum condemns all forms of corruption which must be reflected in the actions of both employees and elected representatives.
- Elected representatives and employees must not make use of their position in Adoptionscentrum for their own or another party's gain in contacts with employees, partner organisations or other people/groups.
- Bribes must neither be given nor accepted.

- As a representative of the organisation, one must not participate in activities that lead to personal gain.
- Gifts to and from colleagues, partners or others may be accepted in the capacity of representative of the organisation, provided that they are of low value and it is an expression of gratitude at a reasonable level.

Transparency – All operations should be characterised by openness regarding policies, strategies, plans, decisions, reports and financial matters. Transparency is crucial for the ability to combat corruption. The possibility of insight into the activity strengthens control and creates trust both in relation to employees, donors and partners, as well as the people for whom the operations are intended.

Possible measures – Adoptionscentrum shall act if there is evidence of malpractice or corruption. The agreement should be terminated if rectification is not made.

Measures to prevent corruption

Adoptionscentrum's work to prevent and deal with corruption takes place at all levels and within all parts of its operations.

Operating plans

- The risks of corruption should be considered and analysed when developing country strategies and operational plans.
- If the risk of corruption in general or within certain operations is considered as high, a special description should be made as to how this risk will be dealt with.

In general

- Adoptionscentrum shall ensure that staff are familiar with Adoptionscentrum's policy against corruption.
- Adoptionscentrum shall ensure that local partners are familiar with Adoptionscentrum's policy against corruption.
- Adoptionscentrum shall ensure that there are clear routines and systems for dealing with cases of suspected corruption.
- Adoptionscentrum shall ensure that the documented routines, instructions and forms that contribute to counteracting corruption in the operations are well known and applied within the organisation.

Monitoring by Adoptionscentrum

- A person shall be appointed by the managing director to be responsible for an annual co-ordination and monitoring of the implementation of Adoptionscentrum's policy against corruption.

- A plan of action and its follow-up shall be documented in writing and be part of the organisation's regular work on planning and monitoring of operations.
- Adoptionscentrum may hire chartered accountants as part of the monitoring.

Reporting, protection against reprisals and the right to be anonymous

- If there is reason to suspect irregularities one should contact the managing director as a first choice. If the suspicions involve the management of Adoptionscentrum, one can contact the chairperson of the board.
- Anyone who in good faith reports a suspected violation must be protected against harassments, reprisals or any kind unfavourable treatment due to the reporting.
- Anyone who has submitted a report in accordance with this policy must always feel sure that their identity is not disclosed to unauthorized persons or persons involved in the case without their own approval. Exceptions are when it is required with reference to national law or authority requirements.
- It is possible to make an anonymous report by writing a letter to the managing director or chairperson of the board.

Measures in case of suspicion of corruption or conflict of interest

The actions taken in the event of a complaint or report of suspicion of corruption or disqualification/conflict of interest depend on the nature of the complaint or report.

General complaints are dealt with by the managing director who can delegate the issue to an appropriate person within the organisation. In case of reports on infringements of this anti-corruption policy or the policy of conflict of interest the managing director will make an assessment as to whether it should be reported to the chairperson. When the managing director is informed about suspicions of serious violations, for instance illegal actions, the chairperson must be informed immediately. In serious cases the chairperson must inform the other board members. All reports of suspicions of corruption will be investigated.

If an investigation shows that irregularities have occurred, the board is responsible to decide about further actions. No illegalities are accepted, and appropriate measures will be taken in accordance with Swedish law and regulations.

Definitions of expressions within the area of corruption

Corruption, abuse of position of trust for personal gain, such as offering bribes and taking bribes.

Offering bribes, a crime committed by giving, promising or offering a bribe or another unlawful reward.

Nepotism, improper favouring of relatives and friends, in particular when making appointments to public posts.

Swindle, a crime of dishonesty committed by a person who publicly announces or otherwise disseminates among the public misleading information in order to affect the price of a good, security or other property.

Disqualification/Conflict of interest, an objection to a person's neutrality or competence in some other respect, for example, as a judge.

Embezzlement, crimes involving breaches of trust. Embezzlement occurs when a person who has received property in his or her possession on behalf of another, inter alia, appropriates the property or otherwise disregards his or her obligations for personal gain and to the detriment of the lawful owner.

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