

## **ANTI-CORRUPTION POLICY**

Adopted on June 12, 2012 by the boards of directors

### **1. DEFINITIONS**

- 1.1. By “corruption,” LWBC understands all the ways of using resources and skills that are contrary to the laws, regulations, ethical norms, policies and directives of LWBC, with the aim of providing unfair benefits to some people or groups.
- 1.2. Corruption can take several forms. In this regard, the Corruption of Foreign Public Officials Act (S.C. 1998, ch. 34) is inspiring LWBC in considering the “act of corruption” as:
  - 1.2.1. giving, offering or agreeing on giving or offering to a public agent or any other person a loan, a reward, a remuneration or a benefit of any kind or any amount whatsoever, for this person or for another person or entity.
    - 1.2.1.1. with the aim of getting or conserving a benefit;
    - 1.2.1.2. in compensation of an act or an omission; or
    - 1.2.1.3. to convince this public agent or this person to use his or her position to influence acts or decisions of the organization for which he or she is performing duties;
  - 1.2.2. to do, offer or agreeing on doing or offering a payment aiming at
    - 1.2.2.1. ensuring the collaboration of a public agent or any person; or
    - 1.2.2.2. hastening or guaranteeing the execution of an act by such public agent or person;
  - 1.2.3. to request, reclaim, accept or encourage in any manner a payment, a loan, a reward, a remuneration or a benefit of any kind or any amount, for himself or herself or for another person or entity
    - 1.2.3.1. as a condition to provide an inappropriate benefit;
    - 1.2.3.2. in compensation for an act or omission; or
    - 1.2.3.3. in compensation for the utilization of his or her position to influence acts and decisions of LWBC or any other entity or person(s);

- 1.2.4. to commit any other act constituting in a practice of corruption or an illicit practice.
- 1.3. Unless otherwise noted, in this text the expression “LWBC representative” designates administrators, committee members, members of the organization, volunteers, volunteer cooperants, interns, employees, consultants and other LWBC agents/representatives, with the exception of partners and donors.

## **2. AIM AND SCOPE**

- 2.1. LWBC recognizes that corruption, which is first of all a violation of laws, rules and ethical norms, is also an insidious evil whose effects are both multiple and prejudicial. Therefore, corruption constitutes an infringement against justice in addition to representing a threat to stability and security of societies, undermining institutions, democratic and ethical values and compromising sustainable development and rule of law.
- 2.2. Corruption is a practice that is opposed to the values, principles of action and LWBC Code of Ethics; corruption can compromise the achievement of the fundamental mission of LWBC.
- 2.3. The representatives of LWBC are susceptible to being confronted by situations where “incentive payments” can be evoked or sought, implicitly or explicitly, directly or indirectly, aiming at “facilitating” the gain of services, the quick achievement of a task or assignment, or the collaboration of third parties to the objectives and activities of the organization. It may sometimes happen that individuals linked directly or indirectly to LWBC require or expect to benefit from such favors. Conversely, LWBC representatives can be offered diverse gifts or benefits for particular reasons.

LWBC is conscious of the difficulty of managing such situations. Consequently, the present policy aims at ensuring that LWBC practices and activities do not permit, encourage or facilitate in any way corruption.

- 2.4. The present policy applies to all the representatives of LWBC. It is communicated to each person, moral or physical, on her/his way to becoming or already a representative of LWBC, or to every other pertinent third party.
- 2.5. This policy is inspired by multiple pertinent national and international instruments with regards to the fight against corruption; among others, in the United Nation Convention against Corruption, the OCDE Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the Corruption of Foreign Public Officials Act and its application manual.

### **3. INDIVIDUAL BEHAVIOURAL RULES**

- 3.1. LWBC does not accept any form of corruption. Bribes, misappropriation of money, robbery, fraud, malfeasance as well as any other form or act of corruption are prohibited.
- 3.2. LWBC forbids the granting or acceptance of honors, decorations, favors, gifts, invitations, rewards or compensation of any person, enterprise, organization or authority without the prior written authorization of LWBC; understanding that the present article does not prohibit accepting small personal gifts that constitute the normal expression of courtesy or hospitality and that do not call into question the integrity of LWBC and its representatives.
- 3.3. LWBC prohibits the use of the organization's resources for personal gains or for other gains that are not related to the accomplishment of LWBC's mission, programs and activities.

### **4. INSTITUTIONAL REGULATIONS**

#### **4.1. Institutional Commitment**

- 4.1.1. LWBC is committed to adopting, maintaining and reinforcing measures that promote transparency and prevent conflicts of interest and corruption.
- 4.1.2. LWBC is committed particularly to disseminating the organization's activities to the general public and make audited financial statements accessible to donors and any relevant person, with the exception of confidential information or information otherwise protected by the law.
- 4.1.3. The financial standards are audited according to an audit standard generally recognized in Canada and the auditors must produce a recommendation letter to the Board of Directors.
- 4.1.4. LWBC encourages righteousness, integrity and honesty of its representatives, particularly by means of a code of ethics that prevents conflicts of interest and promotes the implementation of best practices by the organization as well as in its contractual relations with the state and other organizations.
- 4.1.5. As the case may be, LWBC is committed to cooperating with the authorities investigating on corruption acts within the organization, with respect to and in compliance to the existing protection rules of private life and personal data.

## **4.2. Prevention in Human Resources Management**

- 4.2.1. LWBC implements systems of recruitment, enter into employment, promotion and management of employees that, while taking into account the economic realities of the organization, also:
  - 4.2.1.1. are based on efficiency principles, transparency and on objective criteria as merit, equity and aptitude;
  - 4.2.1.2. involve appropriate procedures to select called upon holding positions considered as particularly exposed to corruption;
  - 4.2.1.3. enable adequate remuneration and equitable pay scales;
  - 4.2.1.4. foster the offers of education programs and training which permit them to carry out their duties with righteousness, honesty and integrity and that sensitize them to the risks of corruption in the exercise of their functions.
- 4.2.2. In order to reduce corruption and abuses, LWBC undertakes, when recruiting, serious measures aimed at ensuring that future employees, cooperants, interns and volunteers are of good morals and conduct and are not submitted to influences that can constitute a source of corruption. References are requested of the former employer and verified and prior verifications are made (such as judicial and criminal records) every time that it is possible and pertinent.
- 4.2.3. When new representatives are taking office, LWBC must be sure that the latter have received and adhered to the present anti-corruption policy.
- 4.2.4. The topic of corruption is especially addressed during the training of volunteer cooperants as well as in the country handbooks and manuals that are handed to LWBC volunteers.

## **4.3. Prevention in Projects Management**

- 4.3.1. Due to their supervision role in the implementation of activities and their hierarchical position, managerial team members and heads of mission are called upon to contribute to the prevention of corruption as well as abuses; they also need to take the necessary measures to protect LWBC representatives against pressures from a third party.
- 4.3.2. LWBC carefully selects its partners and is committed to inform them of the corruption issue and to support them actively in their efforts to fight against it.
- 4.3.3. The contracts with partner organizations include the present anti-corruption policy in annex.

## **5. PROCEDURE**

### **5.1. Notification of alleged corruption acts**

- 5.1.1. LWBC sets up measures and systems in order to facilitate the notification to competent people by the representatives of LWBC of alleged corruption acts of which they are aware of in the exercise of their functions.
- 5.1.2. Any person suspecting an act of corruption being committed, or on the way of being committed, has to immediately declare his or her suspicions. This person can communicate confidentially, orally or in writing, whether:
  - 5.1.2.1. with a member of the managerial team;
  - 5.1.2.2. with the person in charge of human resources; or;
  - 5.1.2.3. with the person coming from outside of the organization and identified by LWBC, when the notification to the above mentioned people cannot be considered reasonably or when it turns out to be impossible for the person to carry out the notification.
- 5.1.3. LWBC makes sure to maintain a favorable climate for good faith notification of all alleged acts of corruption.
- 5.1.4. LWBC makes sure that people declaring someone in good faith of an alleged act of corruption committed or on the way of being committed do not undergo any form of punishment or retaliation. Wherever circumstances so require and human resources permit it, LWBC makes sure that these persons are protected by the appropriate measures. If necessary, and whenever possible, their identity is kept secret before, during and after the investigation.
- 5.1.5. LWBC ensures that the reputation of the suspected person is not tarnished during the processing of cases that are the object of a corruption allegation.
- 5.1.6. People who allege or disclose abusively, in bad faith or without any reasonable motive cases of corruption that are unfounded, that spread misleading allegations, that defames or tarnishes the reputation of persons suspected of corruption, are penalized.

### **5.2. Processing of suspected cases**

- 5.2.1. In each of the cases mentioned in the article 5.1.2, the notified person must ensure that LWBC communicates with the person that has made the notification, initiates investigation and elaborates the report.
- 5.2.2. LWBC first makes sure that the notification is not abusive.

A notification is abusive when it is clearly unfounded, frivolous or dilatory or constituting a vexatious behavior. It can also result from bad faith, the

use of the procedure in an excessive or unreasonable way or in order to harm others.

If the notification is considered abusive, LWBC informs the person who disclosed the allegation. Should this not be the case, LWBC undertakes the investigation as detailed by the article 5.2.3.

- 5.2.3. LWBC investigates on alleged cases in the manner it considers to be the most appropriate according to the circumstances. LWBC can form an ad hoc committee charged of the diligent investigation. LWBC makes sure that the investigation is conducted in an independent and equitable way.
- 5.2.4. Throughout the duration of the investigation, LWBC can suspend the suspected person from his/her duties. Each time that circumstances permit it, the immediate superior needs to be consulted before.
- 5.2.5. The information regarding suspicion of corruption is treated confidentially.
- 5.2.6. Presumption of innocence is applicable to suspected people.
- 5.2.7. Before deciding disciplinary measures or penalties, the person who has been accused must be given a hearing and the right to present his/her version of the events with regards to the notification.

### **5.3. Proven cases of corruption**

- 5.3.1. Representatives of LWBC who committed proven acts of corruption are liable of appropriate penalties, according to the level of seriousness, which can go as far as the discharge of the individual or the immediate cancellation of the contract that link them to LWBC and, eventually, legal proceedings.
- 5.3.2. The general director reports the proven cases of corruption to the Board of Directors.
- 5.3.3. The different stakeholders that need to be informed of the proven cases of corruption receive the information transparently and within a reasonable period of time.