



Anti-Corruption, Anti-Fraud & Anti-Bribery POLICY

In its procurement policies & in its HR guidance, IsraAID clearly sets a list of banned practices & PROHIBITED BEHAVIORS.

Bribery, Fraud & Corruption:

IsraAID embraces a zero-tolerance policy against bribery, fraud, and corruption, including moral corruption. The organization prohibits the exchange of money for unofficial services, especially with public service officials, including military and police personnel, except in specific life-threatening circumstances. IsraAID's employees, volunteers and service providers who engage in bribery shall immediately be subject to disciplinary measures in accordance with the Human Resource policy, the anti-fraud policy, and the present code of conduct.

In cases where IsraAID's employees witness bribery and corruption within the organization, they shall immediately report to their supervisor. In case the incident includes the supervisor, it should immediately be reported to the Human Resources department.

Instances where employees, volunteers, and service providers had no choice but to provide money in order to receive services, outside of the official framework (e.g. in life-threatening circumstances), it shall immediately be reported to the Country Director/Head of Mission and recorded in an incident report using IsraAID's incident report template.

Bringing small gifts to partners, colleagues and people IsraAID works with, shall however not be considered bribery but recognition for good services and/or friendship within the official professional setting, provided that their values do not exceed reasonable costs according to the cultural context of Operation.

1. Banned Practices

IsraAID requires its suppliers to comply with the highest ethical standards and report all suspected acts of fraud and corruption. Thus, IsraAID strictly bans a series of practices in its procurement process:

1. Corruption: IsraAID expects its suppliers to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

2. Conflict of Interest: IsraAID suppliers are expected to disclose to IsraAID any situation that may appear as a conflict of interest and disclose to IsraAID if any IsraAID official or

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professional under contract with IsraAID may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

3. Gifts and Hospitality: IsraAID has a "zero tolerance" policy and does not accept any type of gift or any offer of hospitality. IsraAID will not accept any invitations to sporting or cultural events, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. IsraAID expects its suppliers not to offer any benefit such as free goods or services, employment or sales opportunity to an IsraAID staff member in order to facilitate the suppliers' business with IsraAID.

IsraAID prohibited behaviors & practices;

- **Corruption & Bribery:** offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party;
- **Fraud:** any act or omission, including a representation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation;
- **Coercion:** any act or omission that impairs or harms, or threatens to impair or harm, directly or indirectly, any party or the property of the party to improperly influence the actions of a party;
- **Collusion:** an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party;
- **Unethical Practices:** behavior that constitutes a conflict of interest, or that is contrary to the policies and requirements of the organization, including but not limited to post-employment and gifts and hospitality provisions;
- **Obstruction:** acts or omissions by a supplier that prevent or hinder the organization from investigating complaints of the supplier's engagement in Proscribed Practices;
- **Employment of Child Labor** (IsraAID's policy against child labor and modern slavery);
- **Sexual Exploitation and Abuse** (IsraAID's code of conduct against Sexual Exploitation and Abuse).

Segregation of duties

IsraAID has developed an administrative structure based on segregation of responsibilities for procurement. This structure typically recognizes that the requisitioner, budget controller, buyer, receiver and payer should be separate authorities, in order to provide appropriate organizational checks and balances, and to permit specialization in their respective professional areas. The main purpose is to reduce the possibility of fraud and corruption, and to emphasize accountability of all key players in the procurement process.