

Forum for Protection of Public Interest (Pro Public) Anti-Corruption Guideline

1. Purpose:

The adoption and maintenance of high ethical value is a core principle of Pro Public. Pro Public is also committed to operating its activities in compliance with all applicable laws in the jurisdictions in which it operates. Pro Public recognizes that conduct by individuals outside of a particular jurisdiction can have legal implications within that particular jurisdiction.

Corruption, if it exists in its any form, poses serious legal, moral and reputational risks to Pro Public's status. Pro Public is at risk of corrupt activity because in the course of activities it:

- (i) Requires renewal of registration and approval of activities from the government;
- (ii) Requires to receive donations from government, private sector and development partners; and
- (iii) Procures goods and services of various ranges.

The objectives of this policy are to:

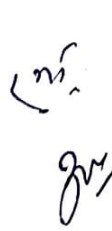
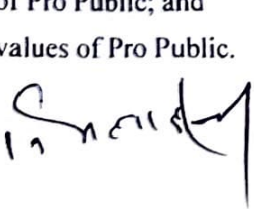
- ☒ reinforce Pro Public's commitment to anti-corruption compliance;
- ☒ set out Pro Public's standards of conduct for the prevention and control of corruption;
- ☒ provide the foundation for the development of procedures to manage Pro Public's corruption risk; and
- ☒ provide for the effective communication and review of the policy and its associated procedures.

2. Scope:

This policy is applicable to Pro Public, its members, members of Executive Committee, employees, and volunteers.

This policy sets out minimum standards of conduct applicable to Pro Public. It is anticipated that the policy may need to be adapted and possibly enhanced to reflect the legislative requirements relating to corruption in particular jurisdictions. The policy should be read and applied in conjunction with:

- ☒ applicable disciplinary procedures;
- ☒ local applicable legislation in the country of operation;
- ☒ constitution (statutes), Financial Guidelines and Operational Policy and others entire policies of Pro Public; and
- ☒ values of Pro Public.



with Pro Public's activities (including the activity of employees or third parties working on behalf of Pro Public) or with the functions of government or other public bodies or development partners.

5.3 Facilitation Payments:

Pro Public prohibits facilitation payments¹. Pro Public recognizes that there may be circumstances in which an official immediately threatens or compromises the personal safety and security of an individual concerned (or another) in order to procure the payment. In such situations, any payment must be reported in accordance with the relevant procedures.

5.4 Gifts, Entertainment (hospitality) and Expenses:

Pro Public recognizes that fostering good relationships with government, other public bodies, and development partners is important to its continued success. The provision and receipt of gifts and entertainment and incurring expenses on behalf of government or other public bodies or development partners is acceptable in principle provided that they are reasonable, proportionate, made in good faith and made transparently. However, the provision or receipt of any gift or entertainment, and the incurring of any expense on behalf of government or other public bodies or development partners, is not permitted where it is offered or received in exchange for improper benefit, creates (or may create) a sense of "obligation", influences (or could influence, in any way) activities, judgment or creates (or may create) a conflict between a Relevant Person's personal interests and those of Pro Public or is otherwise illegal. Any activity that could be perceived as having any of the above effects is also prohibited.

Pro Public's decisions and those of its development partners must be made (and be seen to be made) objectively and without influence by gifts or favors. In all circumstances, gifts, entertainment and expenses on behalf of development partners above a specified value must be subject to an appropriate disclosure process and gifts, entertainment and expenses on behalf of development partners above a specified value must be subject to an appropriate approval process.

5.5 Third Parties:

Pro Public is aware that its reputation may be damaged by the conduct of third parties acting on its behalf or by others with which it does work. In certain circumstances, their actions can have legal implications for Pro Public. As such, it is not acceptable for a third party acting on Pro Public's behalf to act in a way which would breach this policy were the act in question undertaken by Pro Public directly. Pro Public is therefore committed to: (a) taking reasonable steps to ensure that its development partners are made aware of, understand and adhere to this policy (and, where relevant, its associated procedures); (b) verifying the integrity and reputation of its development partners through appropriate and reasonable due diligence in light of perceived levels of risk; and (c) (where appropriate and possible) putting in place appropriate and reasonable controls to monitor the use of Pro Public's money by third parties acting on Pro Public's behalf.

¹ A facilitation payment is payment of a bribe to a government or public official to secure or expedite the performance of a routine action to which the payer is entitled.

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5.6 Interaction with Government Officials and Lobbying

Pro Public does not, directly or indirectly through intermediaries or other third parties, offer, promise or provide any financial or other advantage or otherwise seek to exercise improper influence in its relations with government or public officials or development partners in order to obtain any improper advantage.

5.7 Charitable Contributions and Sponsorships:

Pro Public may make or receive charitable contributions and offer sponsorships for the purposes of socio-economic development, research and know-how, cultural activities, provided that they are not for improper purposes. Charitable donations and sponsorships must not be perceived as being given for improper purposes. When a contribution or sponsorship is proposed, it must be transparent, documented, made in accordance with applicable law and assessed for compliance with this policy and any related procedures.

5.8 Political Donations

Pro Public does not participate directly or indirectly in party politics and does not make or accept payments to or from political parties, politicians or related organizations.

5.9 Use of Assets:

Relevant Persons have a responsibility to protect Pro Public's assets from theft, loss, abuse, unauthorized use or disposal. They must use its assets only for purposes related to conducting their Pro Public responsibilities and may use its assets for other (including personal) uses only when properly authorized.

5.10 Conflict of Interest

Relevant persons must avoid conflict of interest and are expected to perform their duties conscientiously, honestly and in accordance with the best interest of Pro Public. Relevant persons must not abuse their position, misuse confidential knowledge for personal or third party gain, or have any direct involvement in any interest which diverts their attention from, or is in conflict with, Pro Public's social, moral and ethical interests, or which in any way compromises their independence and impartiality.

6. Risk Assessment, Training and Evaluation:

Pro Public is committed to ensuring that:

- (a) Its exposure to corrupt activity is subject to periodic risk assessments;
 - (b) Relevant persons are provided with orientation on this policy and its associated procedures;
- and

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(c) The efficacy of the same in managing Pro Public's corruption risk is evaluated regularly in light of risk assessments.

7. Reporting ("Whistle Blowing"):

A confidential and secure mechanism to enable members of Pro Public, Executive Committee members, Executive Director, employees, and development partners and other stakeholders to raise concerns about behaviour that might be either unlawful or irregular and contrary to the Pro Public's values, including conduct that may breach this policy (or its associated procedures), is established through Pro Public "whistle blowing" facility. Pro Public does not tolerate any form of retaliation, harassment or intimidation of a whistleblower by others as a result of raising concerns through the facility in good faith. All concerns will be investigated and appropriate action taken.

8. Breaches of this Policy:

It is the responsibility of all relevant persons to report any breaches, or suspected breaches of this policy, to their Program Head or other person to whom they report or through the whistle blowing facility. Violations of this policy, including involvement in any corrupt activities and failure to report actual or suspected breaches of this policy (or its associated procedures), will lead to disciplinary action in accordance with applicable disciplinary procedures. In some circumstances, failure to report actual or suspected violations of this policy may itself constitute a legal offence. Pro Public is committed to reporting all instances of corruption and other forms of dishonesty to the relevant authorities and to facilitating criminal action against the individuals concerned where appropriate. Pro Public will seek redress for any losses arising from such actions.

Policy Records:

Approved from the Executive Committee Meeting Held on April 22, 2013

First Revision by the Executive Committee Meeting Held on February 13, 2022

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