

Anti-fraud, anti-corruption, and anti-bribery policy

Policy Statement

RAPiD takes a zero-tolerance approach to any act of fraud, corruption and bribery in any circumstances from RAPiD staff, or its agents, consultants, grantees, vendors, or representatives of any kind. RAPiD is committed to act professionally, fairly and with integrity in all relationships wherever it operates and to implement and enforce effective systems to prevent, detect and counter fraud, corruption and bribery.

All RAPiD staffs are required to avoid any activity that might lead to, or suggest, a breach of his policy. RAPiD will thoroughly investigate any allegations of fraudulence, corruption, bribery. RAPiD employees, and others working on RAPiD of behalf or for its benefit, who do not comply with this policy may be subject to disciplinary action up to and including termination of their employment or other relationship.

Who is Covered by the Policy?

This policy applies to all individuals working at all levels and grades within the RAPiD including board members, directors, employees (whether permanent, fixed-term or temporary), consultants, or any other staff using their RAPiD affiliation to participate in RAPiD activities.

Mechanisms to Voice Concerns

All RAPiD staffs are highly encouraged to raise potential issues before they lead to problems and to seek additional guidance when necessary, without the fear of being penalised. A tentative list of potential risk scenarios (red flags) are provided in Annex A of this policy.

Normally, employees should report such concerns to their respective line Managers, who will be responsible to investigate and keep the Executive Director fully informed. However, other routes are available, and employees are free to discuss the matter with any of the following:

- the Executive Director,
- the Chairman.

All concerns reported will be treated in confidence and fully investigated. If anonymity is requested, every effort will be deployed to ensure confidentiality.

The Manager (or the official) to whom the concerns are expressed will take timely action and the employee will be notified quickly of any action taken. Where action is not considered appropriate, the

employee will also be given a thorough explanation of the reasons for this. In the event of a disagreement, the employee will be advised how to pursue the matter further.

Employees should be mindful that, if a suspicion is reported and results in a prosecution or disciplinary hearing, their involvement as a witness in those processes may be necessary, unless other substantial reliable evidence is available.

There is also a need to ensure that the investigative process is not misused. Therefore, any abuse, such as raising unsubstantiated or malicious allegations, may be dealt with as a disciplinary matter in itself. This should not deter employees from raising genuine concerns (even if subsequently unsubstantiated but made with good intent), as, in so doing, they will be supported in every possible way. The employees may raise their concerns through emailing at complain@rapidbd.org.

Review and Monitoring of Fraud, Corruption, and Bribery Response Mechanism

- The mechanism will be reviewed annually or following an incident of fraud or corruption, to ensure that it reflects changes or adjustments, which may be necessary to strengthen future responses to fraudulence, corruption, and bribery.
- RAPiD Chairman in collaboration with the Executive Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability and usefulness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to review to ensure that they are effective in countering fraudulence, corruption, and bribery.
- All RAPiD staffs are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- This policy does not form part of any employee's contract of employment, and it may be amended at any time.
- RAPiD will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

Associated issues for staff consideration

Statements to the press

Under no circumstances may employees make any statement or comment to the press or media on matters which involve RAPiD without the prior approval of the Executive Director.



Annex A

Potential Risk Scenarios: "Red Flags"

The following is a list of possible red flags that may arise during the course of you working for or with us and which may raise concerns with regards to fraudulence, corruption and bribery:

- you become aware that a RAPiD employee or a third party engages in, or has been accused of engaging in, improper practices;
- you learn that a RAPiD employee or a third party has a reputation for paying bribes, or requiring that bribes are paid to them;
- a RAPiD employee or a third party promises you an advantage if you secure or agree to approve certain grants, projects or other proposals;
- a RAPiD employee or a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a RAPiD employee or a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a RAPiD employee or a third-party requests that a payment is made to "overlook" potential legal violations;
- you receive an invoice from a RAPiD person or a third party that appears to be nonstandard or customized;