

ANTI -CORRUPTION AND FRAUD POLICY

Policy Statement:

GHAWTH's Anti-Corruption and Fraud Policy takes a strict stance against corruption and fraud. We have a stringent zero-tolerance policy against corruption and fraud in all aspects of our operations, and any suspected violations of this policy must be reported to the organization immediately. We take all allegations of corruption and fraud seriously and will conduct a comprehensive investigation before taking appropriate disciplinary action in a transparent and equitable manner. This policy applies to all employees, implementing partners, contractors, and associated third parties who must adhere to its rules. Noncompliance with this policy may result in disciplinary actions, including the termination of employment or contracts and business connections with GHAWTH. Furthermore, GHAWTH reserves the right to seek any additional legal remedies, including civil and criminal procedures, as deemed necessary.

Policy Overview:

At GHAWTH, we believe strongly in conducting our business with the highest ethical standards, honesty, and strict respect to all applicable laws and regulations. Our commitment to sustaining these values is an essential component of our identity. In all our initiatives, we take a rights-based approach that is founded on humanitarian ideals such as humanity, neutrality, impartiality, and independence.

In stark contrast, corruption and fraud immediately undermine GHAWTH's core beliefs and capacity to operate in accordance with its rights-based approach, humanitarian ideals, and dedication to doing no harm. Corruption and fraud have a far-reaching detrimental impact on social, economic, and political development, disproportionately impacting the most vulnerable groups, including refugees, and distorting the effective implementation of our activities. Any involvement in corrupt practices, whether direct or indirect, jeopardizes GHAWTH's integrity, credibility, and the well-being of the people it serves. Thus, eliminating corruption is not only a high priority for GHAWTH, but also a critical obligation stipulated by our mission and expected of all employees, implementation partners, contractors, and associated third parties.

This policy prohibits improper payments such as bribes, kickbacks, excessive gifts or entertainment, and any other payment made or proposed to gain an unfair competitive advantage. These payments should not be confused with reasonable and limited spending on gifts, business entertainment, and other acceptable activities directly related to the operation of GHAWTH's business.

GHAWTH has created a thorough program to implement this Policy, including appropriate advice, training, investigation, and oversight. The HR Officer has overall responsibility for the program, which is supported by GHAWTH's executive director.

The HR Officer oversees providing advice on how to interpret and apply this policy, as well as supporting training and education and responding to reported problems. The ban of bribery and other inappropriate payments applies to all economic activity, but it is especially critical when working with government officials. The following summary is intended to equip personnel involved in foreign activities with a basic understanding of applicable rules to minimize unintended violations and identify possible difficulties in time to be dealt effectively.



Purpose of the Anti-Corruption and Fraud Policy:

1. Set out the Ghawth responsibilities in observing and upholding its policy on bribery, corruption and fraud.
2. Provide information and guidance to GHAWTH employees and partners, grant recipients and their associates on how to recognize and deal with bribery, corruption and fraud issues and establish standards of conduct for GHAWTH employees and partners, grant recipients and their associates to ensure that the act is not violated.
3. GHAWTH operates with entrusted resources, including funds and other valuable assets provided by public and private donors to be used efficiently and effectively in our operations. We have a solemn duty towards these donors to safeguard these resources and ensure they are not compromised by corruption. Every staff member and individual associated with GHAWTH's assets bears the responsibility of preventing any form of corruption in our activities.
4. GHAWTH considers a breach of this Policy to be a serious violation which may result in disciplinary measures, including the dismissal of employees or the termination of its business relationship with any third party.
5. Corruption and fraud are a widespread problem that has become institutionalized and systemic in many communities. This creates a danger both internally and outside in our relationships with people in need, public authorities, contractors, and others. GHAWTH acts in national jurisdictions where governing authorities frequently lack the competence to effectively combat corruption. As a result, we are dedicated to ensuring that our help does not create or exacerbate existing corruption prospects. Our anti-corruption and fraud policy, which is backed by a strict zero-tolerance position, strives not only to eliminate corruption and fraud from our work but also to reduce its overall prevalence in the places where we operate.

Commitment to External Stakeholders:

1. Empowering Beneficiaries: GHAWTH is committed to ensuring that its beneficiaries are fully aware of their rights and entitlements, as well as how to report suspected corruption and fraud to the organization. Furthermore, they will be informed of the required standards and behavior of GHAWTH employees and others subject to this anti-corruption and fraud policy.
2. Protecting Beneficiaries from Corruption and fraud: GHAWTH is committed to preventing its beneficiaries from becoming victims of corruption and fraud, ensuring that they receive the assistance to which they are legally entitled, without exploitation or dishonest activities.
3. Fairness in Benefit Allocation: GHAWTH assures that persons who obtained benefits by corrupt means and are not legitimately entitled to them are barred from getting GHAWTH's assistance.
4. Partner and Third-Party Compliance: GHAWTH is committed to informing and educating its implementing partners, contractors, and associated third parties about the standards and behaviors required under this anti-corruption policy. The penalties for violating the policy, such as the termination of contracts or commercial partnerships with GHAWTH, will be fully notified to them.
5. Promoting Complaints and Reporting Mechanisms: GHAWTH actively encourages the use of its complaints and reporting mechanisms, ensuring that all stakeholders, including beneficiaries, staff, implementing partners, contractors, public officials, and authorities, have secure and confidential channels for reporting suspected corruption.
6. Capacity Building and Support: GHAWTH works to strengthen the capacity and support of communities, civil society, and governments, with the goal of assisting relevant stakeholders in preventing corruption within their spheres of influence.





Ghawth
for Relief and Emergency

Who is covered under the policy?

This policy applies directly to GHAWTH trustees as well as all individuals working within the organization as employees, agents, consultants, or other people who may represent the organization on occasion. GHAWTH's policy requires partners, grant recipients, and associates to comply with anti-corruption and fraud policy when conducting activities supported by the organization.

The term "third party" in this policy refers to any individual or organization you meet while doing your duties.

The Executive Director ensures that third parties who support GHAWTH understand the policy's requirements.

Corruption Definition & Types of Payments are Prohibited:

For GHAWTH, corruption comprises all forms of fraud and is regarded as a serious act of misconduct, precisely in accordance with GHAWTH's Code of Conduct. The organization defines corruption as the following:

Corruption Definition: Corruption is the abuse of entrusted power for personal gain or profit, which frequently involves dishonest or unethical actions such as bribery, embezzlement, nepotism, favoritism, or any other illegal tactics to get unfair benefits or privileges.

The terms "defalcation," "misappropriation," and other fiscal irregularities encompass various actions, including but not limited to:

- Dishonest or fraudulent acts.
- Misappropriation of funds, securities, supplies, or other assets.
- Improper handling or reporting of money or financial transactions.
- Profiting from insider knowledge of company activities.
- Disclosing confidential and proprietary information to external parties.
- Revealing the company's securities activities to unauthorized individuals.
- Accepting or seeking valuable items from contractors, vendors, or service/material providers.
- Destruction, removal, or inappropriate.

GHAWTH defines corruption as the use of entrusted power for personal gain, which extends beyond interactions with public officials. This broad term embraces both intended and actual corrupt practices, both monetary and non-monetary in nature. Examples of corrupt conduct include, but are not limited to:

1. Facilitation payments
2. Bribery
3. Gifts used to exert undue influence.
4. Kickbacks
5. Favoritism
6. Cronyism
7. Nepotism
8. Extortion
9. Embezzlement
10. Misuse of confidential information
11. Theft
12. Forgery or falsification of documents
13. Financial or procurement fraud





Ghawth
for Relief and Emergency

All forms of corruption mentioned above are considered serious misconduct, and GHAWTH is fully committed to preventing and addressing any such instances in accordance with its Code of Conduct.

Record-Keeping:

GHAWTH shall preserve financial records and implement sufficient internal controls to demonstrate the business purpose for making payments to third parties.

GHAWTH employees must disclose and preserve a written record of all hospitality or gifts of any value that will be subject to managerial review.

GHAWTH personnel must submit all expense claims for hospitality, gifts, or expenses incurred by third parties in accordance with the GHAWTH expenses policy, including a stated rationale for the expenditure. Accounts, invoices, memos, and other papers and records pertaining to transactions with third parties, such as clients, suppliers, and business contacts, must be generated and maintained with rigorous correctness and completeness. No accounts may be kept "off-book" to assist or hide illicit payments.

Protection:

Employees who refuse to accept or give bribes, as well as those who express concerns or report wrongdoing, may be concerned about the consequences. GHAWTH's policy states that employees will not face reprisal or harassment for reporting compliance concerns in good faith. GHAWTH seeks to promote transparency and will assist anyone who expresses serious concerns in good faith under this policy, even if they turn out to be incorrect.

GHAWTH is committed to ensuring that no one is subjected to unfair treatment because they refuse to participate in bribery or corruption or because they report in good faith that an actual or potential bribery or other corruption crime has occurred or may occur in the future.

Dismissal, disciplinary action, threats, or other unpleasant behavior in response to raising a concern are examples of detrimental treatment. If you suspect you have received such treatment, you should notify the BOD right away (Reporting@ghawth.org).



العنوان: خلدة- الطريق العام-مقابل تعاونية كبوب -مبنى عبد الهادي محيسن - الطابق الثاني
Address: Khaldeh Main Street, Facing Coop, Abdelhadi Mohaysen Building,2ND Floor.



Ghawth
for Relief and Emergency

Training and Communication:

GHAWTH workers will get frequent training on how to follow this policy and the Act.

Employees who are required to receive training on this policy must additionally complete periodic certification that they (a) have completed and understand the appropriate training, have previously complied with this policy, and agree to comply with it in the future.

Other people subject to this policy, including trustees, consultants, and other relevant persons working as an agent for GHAWTH, will be given access to such training to the greatest extent possible and practicable. GHAWTH's zero-tolerance stance to bribery, corruption and fraud shall be explained to all partners, grant recipients, associates, suppliers, and contractors at the start of their relationship and periodically thereafter.

GHAWTH's Anti-Corruption and Fraud Policy will be published on the GHAWTH website.

Reporting and Investigation:

1. **Serious Approach to Reported Suspicions:** GHAWTH is deeply committed to treating all reported suspicions of corruption with utmost seriousness. Each case will be thoroughly assessed, acted upon, investigated, and appropriate disciplinary measures will be implemented, following professional, transparent, and fair procedures.
2. **Confidentiality and Protection of Reporting Persons:** GHAWTH prioritizes the confidentiality and rights of reporting individuals, ensuring their protection against any form of retaliation for bringing forward suspicions of corruption.
3. **False Reports:** Knowingly making a false report of corruption is regarded as a violation of this policy. Such action will lead to disciplinary consequences, including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with GHAWTH
4. **Asset Recovery:** GHAWTH is determined to seek the recovery of any assets lost due to corrupt practices, thus taking appropriate action to rectify the impact of corruption.
5. **Obligations to Report:** GHAWTH will fulfill its obligations to report instances of corruption to relevant donors and external authorities as appropriate, ensuring transparency and accountability in addressing corruption-related matters.
6. **Corruption and fraud cases can be reported via the following email:** (Reporting@ghawth.org).



العنوان: خلدة- الطريق العام-مقابل تعاونية كووب -مبنى عبد الهادي محيسن - الطابق الثاني
Address: Khaideh Main Street, Facing Coop, Abdelhadi Mohaysen Building,2ND Floor.



Ghawth
for Relief and Emergency

Investigation Responsibilities:

The Board of Directors is responsible for investigating potential corruption and fraudulent activities as indicated in the policy. If the investigation uncovers corruption or fraud, the investigation committee sends reports to the Board of Directors. Legal counsel and top management work together to determine prosecution and case disposition choices.

Confidentiality:

When dealing with information about potentially fraudulent activities, the Board Representative in the investigation committee keeps it strictly secret. The findings of investigations are only shared with those who have a valid need to know. This method is critical for preserving the reputations of individuals who are suspected but later proven innocent, as well as protecting the company from future civil liabilities.

No one can access the email for reports (Reporting@ghath.org) to the Board representative on the Investigation Committee.

Authorization for investigation committee:

The members of the investigating committee are as follows:

- 1: Board of Directors' representative.
2. Executive Director.
3. Human Resources Officer.
4. If the complaint concerns the CEO or HR Officer, the Board of Directors must nominate a replacement to serve on the investigative committee.

Members of the Investigation Committee have the following privileges:

1-Access to GHAWTH records and premises: They are entitled to free and unrestricted access to all GHAWTH records and premises, regardless of ownership or rental status. This access allows them to collect important information and evidence for their investigations.

2-They are entitled to examine, copy, and, if required, remove any portion of the material housed in files, desks, cabinets, or other storage facilities on the premises. This jurisdiction applies to things or facilities that may be in the ownership of anyone involved with those items, without the need for prior knowledge or approval.



العنوان: خلدة- الطريق العام-مقابل تعاونية كووب -مبنى عبد الهادي محيسن - الطابق الثاني
Address: Khaldeh Main Street, Facing Coop, Abdelhadi Mohaysen Building,2ND Floor.



Ghawth
for Relief and Emergency

3-These privileges are provided to ensure that the Investigation Unit has the necessary means to conduct thorough and effective investigations. By having unfettered access to records and premises, they can gather pertinent information and evidence to fulfill their investigative duties.

Reporting procedures:

To ensure a thorough and accurate investigation of suspected improprieties or irregularities, it is essential to exercise caution and avoid premature accusations or alerting those involved.

Here is a precise version of the instructions to be followed:

Immediate Reporting: If an employee discovers or suspects fraudulent activity, they must promptly notify (Reporting@ghawth.org).

Anonymous Reporting: The reporting individual or complainant may choose to remain anonymous during the investigation process.

The Board of Directors representative shall immediately inform the Board of any complaints received and request an immediate meeting of the investigation committee (within a period not exceeding one week) and begin taking appropriate measures.

The Investigation Committee's recommendations must be communicated to the Board of Directors as soon as possible after their completion.

Directed Inquiries: Any inquiries related to the ongoing investigation should be directed to the Investigations Committee or the GHAWTH Legal Representative. This includes inquiries from the suspected individual, their attorney or representative, or any other interested party.

The appropriate response to such inquiries is: "I am not at liberty to discuss this matter."

Maintaining confidentiality: The status of the investigation should not be disclosed, and specific references to allegations, crimes, or fraudulent activities should be avoided.

The reporting individual should be informed of the following instructions:

a) **Non-Contact:** They must not contact the suspected individual directly to gather facts or demand restitution.

b) **Limited Discussion:** They should refrain from discussing the case, facts, suspicions, or allegations with anyone unless specifically requested to do so by the Legal Department or Human Resource Unit.

Adhering to these precise guidelines will help ensure a proper investigation without mistakenly accusing anyone or prematurely alerting the individuals involved.



العنوان: خلدة- الطريق العام-مقابل تعاونية كووب -مبنى عبد الهادي محيسن - الطابق الثاني
Address: Khaideh Main Street, Facing Coop. Abdelhadi Mohaysen Building, 2ND Floor.



Ghawth
for Relief and Emergency

Termination:

If an investigation leads to a recommendation to dismiss an employee, the following steps will be taken before acting:

Review and Approval: HR Officer and the Executive Director will thoroughly review and approve the recommendation to terminate (As per GHAWTH's HR manual). If necessary, independent counsel may be consulted during this procedure.

Authority for termination: The Executive Director does not have the right to terminate an employee on their own. The board is responsible for deciding whether to terminate an employee.

By following this process, careful consideration is given to the recommendation for termination, involving appropriate representatives and ensuring that decisions are made by authorized personnel with oversight. This approach helps maintain fairness and accountability in the decision-making process.

Administration:

The HR Officer has the following responsibilities regarding the policy:

Administration: The HR Officer is responsible for implementing and managing the policy throughout the organization. They ensure that the policy is properly communicated, understood, and followed by all employees and departments.

Revision: The HR Officer regularly reviews the policy to assess its effectiveness and relevance. If needed, they revise the policy to align it with changes in laws, regulations, or organizational requirements.

Interpretation: The HR Officer interprets the policy and provides guidance to employees and managers on its meaning and application. They address any questions or concerns regarding the policy and ensure consistent understanding and implementation.

Application: The HR Officer ensures that the policy is applied consistently across the organization. They work with managers and employees to ensure compliance and address any issues or challenges related to its application.

Furthermore, the HR Officer conducts an annual review of the policy to evaluate its efficacy. They identify any areas that require updates or improvements and make necessary revisions to the policy to keep it current. In summary, the HR Officer is responsible for administering, revising, interpreting, and applying the policy within the organization. They review the policy annually and make revisions as necessary to ensure its effectiveness and alignment with organizational needs.





Ghawth
for Relief and Emergency

Acknowledgement

I acknowledge receipt of the GHAWTH's Anti-Corruption and Fraud Policy and Procedures. I have read the policy; I understand it, and I accept the contents as part of my condition:

Of employment with GHAWTH.

OR

Volunteer with GHAWTH.

OR

Contracting with GHAWTH.

I acknowledge that I must attend all training related to the GHAWTH's Anti-Corruption and Fraud Policy. Failure to complete the training program will result in the termination of my employment, volunteer association, or contracting ability with Ghawth. All new hires and associations with GHAWTH must complete their initial training within 90 days of acknowledging this form. I understand that it is my responsibility to ensure this training is complete.

Name:

Signature:

Date:



Adopted by the Board Members
12, October 2009, updated 29 April 2024

RK [Signature] NR [Signature]

العنوان: خلدة- الطريق العام-مقابل تعاونية كووب -مبنى عبد الهادي محيسن - الطابق الثاني
Address: Khaldeh Main Street, Facing Coop, Abdelhadi Mohaysen Building,2ND Floor.