



Anti-Corruption and Bribery Policy

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Preamble

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil operates under a **strict zero-tolerance policy** toward corruption, bribery, fraud, collusion, extortion, embezzlement, abuse of authority, and any other conduct that compromises integrity, fairness, lawful decision-making, or public trust. The Organization affirms that ethical conduct is not a discretionary aspiration but a **binding operational requirement** applicable to all personnel, officers, directors, consultants, contractors, agents, intermediaries, representatives, and any third party acting on behalf of, or in connection with, the Organization.

This Policy is adopted in recognition of the fact that corruption and bribery are not merely unlawful acts; they are **fundamental breaches of trust** that undermine institutional credibility, distort legitimate processes, expose individuals and organizations to civil, criminal, regulatory, and reputational harm, and erode the moral legitimacy of any mission grounded in research, technical, institutional, or advocacy activity. **No business objective, operational pressure, relational consideration, cultural convenience, or claimed commercial necessity shall ever justify corrupt conduct.**

The Organization expressly condemns any attempt to secure, retain, influence, accelerate, or conceal an outcome through improper advantage, whether direct or indirect, whether conducted personally or through intermediaries, and whether involving public officials, private sector counterparties, international bodies, community actors, or any person exercising formal or informal influence. **Improper advantage is prohibited in all forms**, including but not limited to cash payments, gifts, hospitality, travel, entertainment, preferential treatment, hidden commissions, kickbacks, charitable donations used as a disguise for influence, political contributions made to obtain benefit, employment offers, consulting arrangements, and any item or service of value intended to induce, reward, or conceal misconduct.

This Policy is intended to provide a clear and enforceable framework for prevention, detection, escalation, investigation, remediation, and accountability. It is designed to ensure compliance with applicable anti-corruption laws and standards, including **the United Nations Convention against Corruption (UNCAC), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the UK Bribery Act 2010**, and all other applicable local, national, and international legal requirements. Where legal obligations differ, **the stricter standard shall apply** unless prohibited by law.

The Organization expects the highest standard of personal and institutional integrity. Every individual covered by this Policy must act with **honesty, transparency, documentary accuracy,**



and unimpeachable good faith. No one may knowingly ignore suspicious conduct, fail to escalate red flags, falsify records, conceal a prohibited benefit, or assist another person in evading compliance controls. **Silence in the face of corruption is not neutrality; it is complicity.**

This Policy further establishes that all records, approvals, financial entries, due diligence outputs, procurement decisions, expense claims, donation records, sponsorship arrangements, and third-party engagements must be truthful, complete, timely, and capable of independent verification. **False documentation, off-book activity, undisclosed arrangements, and misleading narratives are strictly prohibited** and will be treated as serious misconduct.

The Organization reserves the right to investigate any suspected violation, cooperate with competent authorities, impose disciplinary or contractual measures, and implement corrective action where necessary to prevent recurrence. **No individual is above this Policy, and no exception may be presumed.** Any violation, attempted violation, facilitation of a violation, or failure to report known misconduct may result in immediate internal sanctions, termination of engagement, contractual remedies, referral to law enforcement, and any other lawful measures deemed appropriate.

I. DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings set out below. These definitions are to be interpreted **broadly, in good faith, and in a manner that advances the preventive purpose of the Policy**, rather than narrowly so as to create loopholes or evade responsibility.

1. Corruption

Corruption means the misuse, abuse, or distortion of entrusted power, authority, access, influence, information, position, or resources for personal, financial, relational, political, professional, or organizational gain. It includes, without limitation, the abuse of office for private advantage, manipulation of procedures, unauthorized favoritism, concealment of relevant facts, improper manipulation of procurement or selection processes, and any conduct by which a person unlawfully secures an advantage that should have been determined by lawful, objective, and merit-based criteria. Corruption may occur in the public or private sector, may be direct or indirect, and may be executed personally or through intermediaries, affiliates, or related parties. **The essence of corruption is the betrayal of entrusted responsibility for improper benefit.**

2. Bribery

Bribery means the offering, promising, giving, authorizing, requesting, soliciting, accepting, or receiving of anything of value with the intent to influence, reward, induce, secure, or improperly affect a decision, act, omission, judgment, performance, or official position in a professional, contractual, commercial, administrative, governmental, or quasi-governmental context. “Anything of value” shall be interpreted expansively and includes money, gifts, favors, services, discounts,



hospitality, travel, employment opportunities, internships, commissions, loans, entertainment, access, privileges, confidential information, charitable or social contributions, and any other tangible or intangible benefit. Bribery exists regardless of whether the intended improper result is achieved; **the unlawful agreement, proposal, or offer itself may be sufficient to constitute a violation.** Bribes may be direct or indirect, paid or promised, concealed or openly disguised, and may be routed through agents, consultants, family members, business partners, charities, vendors, or other intermediaries.

3. Facilitation Payments

Facilitation Payments means small or purportedly minor payments, benefits, or inducements made to secure, accelerate, or obtain the performance of routine, non-discretionary governmental or administrative actions, such as permits, licenses, customs clearance, inspections, visas, registrations, utilities, or routine processing that a person is already legally entitled to receive. Such payments are **prohibited as a matter of policy** because they create a corrosive culture of expectation, normalize improper conduct, and expose the Organization to escalating legal and ethical risks. Where a local law exceptionally permits a particular payment, such permission shall not be interpreted as authorization to make such payment unless the action is expressly approved in advance by the Organization's competent compliance authority and is fully documented. **No employee or representative may assume legality, necessity, or safety based on custom, urgency, or local practice.**

4. Conflict of Interest

Conflict of Interest means any situation in which personal, familial, financial, relational, social, political, or other outside interests, duties, loyalties, or expectations could reasonably influence, appear to influence, or create a risk of influencing independent professional judgment, objectivity, loyalty, impartiality, or decision-making in the performance of duties on behalf of the Organization. A conflict may be actual, potential, or perceived. It arises not only where a person acts improperly, but also where the circumstances create a credible risk that decisions may be compromised or seen as compromised. Conflicts of interest must be disclosed promptly and managed transparently. **Failure to disclose a conflict is itself a serious breach of trust,** particularly where the undisclosed interest affects procurement, hiring, contracting, supervision, grant management, investigations, payments, or any decision affecting organizational resources or credibility.

5. Related Party

Related Party means any individual or entity with whom a covered person has a personal, familial, romantic, social, financial, managerial, ownership, control, advisory, or other significant connection that could influence, or reasonably be perceived to influence, that person's professional judgment or conduct. This includes, without limitation, immediate and extended family members, spouses, domestic partners, close personal associates, business partners, jointly controlled entities, beneficial ownership interests, affiliated companies, and any person or entity in which the covered



person has a direct or indirect financial interest, influence, or expectation of benefit. A related party may create a conflict of interest, an appearance of impropriety, or an undue risk of favoritism even where no actual misconduct has yet occurred. **All related-party relationships relevant to organizational decisions must be disclosed fully and without delay.**

6. Public Official

Public Official means any person holding legislative, administrative, executive, judicial, regulatory, enforcement, diplomatic, military, customs, tax, immigration, procurement, licensing, public health, or other governmental authority or function, whether elected, appointed, employed, contracted, or acting in an official capacity, including officers or employees of public international organizations where applicable. This definition also includes any person acting on behalf of such an authority or exercising de facto public power. For the purposes of this Policy, the term is to be understood broadly so that no individual can evade scrutiny by relying on technical status distinctions. **Any engagement with a Public Official must be conducted with heightened integrity, full documentation, and absolute legality.**

7. Thing of Value

Thing of Value means any direct or indirect benefit, advantage, transfer, concession, service, favor, or expectation that has actual or perceived value to the recipient. It includes cash, non-cash gifts, vouchers, discounts, rebates, travel, accommodation, meals, entertainment, tickets, subscriptions, equipment, samples, services, loans, debt forgiveness, job offers, internships, charitable support, procurement opportunities, data, confidential information, or any intangible benefit capable of influencing conduct. The term is to be interpreted broadly because corrupt schemes frequently rely on items that are modest in appearance but substantial in influence. **Even nominal value may be prohibited where the purpose or effect is improper influence.**

8. Third Party

Third Party means any person or entity that is not directly employed by the Organization but acts for, with, on behalf of, or in a relationship materially connected to the Organization. This includes agents, consultants, intermediaries, contractors, vendors, suppliers, subcontractors, advisers, lobbyists, introducers, joint venture partners, and any other external counterparties who may interact with officials, clients, stakeholders, regulators, or business partners in a manner that could create corruption risk. **The Organization may be held responsible for improper conduct carried out through third parties**, and no third party may be used as a shield to bypass this Policy.

9. Gift and Hospitality

Gift and Hospitality means any benefit, courtesy, entertainment, meal, travel, lodging, event access, recreation, or similar item of value provided or received in connection with organizational business. Gift and hospitality arrangements are not prohibited merely because they are customary; however, they are strictly prohibited where they are intended, or may reasonably be perceived, to



influence decision-making, secure favor, reward a past act, create dependence, or disguise an improper advantage. **All gift and hospitality activity must remain modest, proportionate, lawful, transparent, and properly recorded,** and must never create even the appearance of compromise.

10. Fraud

Fraud means any intentional deception, concealment, misrepresentation, omission, abuse of process, or false statement made to secure an unlawful gain, avoid a lawful obligation, obtain an improper benefit, or cause loss to another person or entity. Fraud includes forged documents, false invoices, inflated claims, misclassification of expenses, false procurement statements, manipulation of evidence, and deliberate concealment of material facts. While distinct from bribery, fraud frequently accompanies corruption and is treated under this Policy as equally incompatible with the Organization's ethical standards. **No deceptive practice shall be tolerated on the basis that it is "administrative," "commercial," or "customary."**

II. PROHIBITED CONDUCT

CILC maintains a **strict zero-tolerance policy** toward corruption, fraud, concealment, self-dealing, and any other conduct that undermines the integrity, neutrality, accountability, or lawful operation of the organization. The prohibitions set out below apply to **all employees, officers, directors, contractors, consultants, advisers, agents, volunteers, interns, and any other person acting on behalf of, under the authority of, or in the name of CILC,** whether acting **directly or indirectly**, individually or in concert with others, and whether the conduct is **attempted, completed, authorized, solicited, promised, concealed, or facilitated through a third party.** No person may rely on informal custom, operational pressure, private arrangements, or perceived necessity as justification for conduct that violates these standards. **Integrity is mandatory, not discretionary.**

A. Active Bribery

Active bribery is strictly prohibited in every form. No person acting for or on behalf of CILC may offer, promise, authorize, give, or arrange, directly or indirectly, **anything of value** to any government official, public authority, private sector representative, community leader, business partner, supplier, contractor, consultant, intermediary, or any other third party for the purpose of improperly influencing a decision, securing an advantage, obtaining preferential treatment, or inducing an act or omission in CILC's favor. The phrase **anything of value** must be interpreted broadly and includes, without limitation, **cash, gifts, travel, accommodation, meals, entertainment, hospitality, honoraria, discounts, employment offers, internships, consulting engagements, charitable donations made for improper purposes, reimbursement of personal expenses, benefits to relatives or associates, or any other direct or indirect advantage.** The prohibition applies equally where the benefit is offered through an intermediary, front company, nominee, shell entity, family member, associate, or any other concealed channel designed to



obscure the true source, recipient, or purpose of the benefit. It is immaterial whether the intended recipient accepts the offer, whether the benefit is ultimately delivered, or whether the improper objective is achieved. **The mere offering, promising, or arranging of a corrupt inducement constitutes a violation.** CILC rejects any conduct that seeks to distort independent judgment, bypass lawful procedure, or purchase influence by means of private gain.

B. Passive Bribery

Passive bribery is equally prohibited and will be treated with the same seriousness as active bribery. No person acting for or on behalf of CILC may **request, solicit, accept, agree to accept, or permit to be promised** any thing of value in exchange for favorable treatment, a preferred decision, confidential assistance, expedited processing, reduced scrutiny, or any other advantage connected to professional duties or organizational responsibilities. This prohibition includes the direct or indirect solicitation of **kickbacks, commissions, rebates, secret fees, gratuities, unlawful referral payments, hidden benefits, personal sponsorships, or any form of compensation not duly authorized and transparently recorded.** It also includes conduct by which an individual abuses a position of trust to create an expectation of payment, reward, or personal benefit in return for performing, delaying, concealing, recommending, approving, or refraining from any official action. **No person may leverage their role, authority, access, or influence as a private bargaining tool.** A request may be explicit or implied; a benefit may be demanded openly or suggested through hints, signals, omissions, or strategic silence. The prohibition applies whether the benefit is sought for the individual, a relative, a household member, a business associate, a political affiliate, or any other person or entity with whom the individual has a connection. **Acceptance of an improper advantage, even if disguised as hospitality, honor, or appreciation, is a fundamental breach of trust.**

C. Embezzlement & Fraud

Embezzlement, fraud, theft, concealment, and any dishonest manipulation of organizational resources are strictly forbidden. No person may misappropriate, divert, conceal, convert, misuse, or otherwise exploit CILC funds, assets, records, data, systems, opportunities, or information for personal gain or for the benefit of any unauthorized third party. This prohibition applies to **cash, grants, client payments, bank accounts, equipment, vehicles, devices, supplies, intellectual property, confidential information, program resources, and any other tangible or intangible asset entrusted to CILC's custody or control.** Fraud includes, without limitation, the **intentional falsification, alteration, fabrication, omission, or destruction of records**; the submission of false or misleading timesheets, invoices, expense reports, receipts, payroll records, procurement documents, grant reports, monitoring data, or financial statements; and the manipulation of program or compliance records to conceal misconduct, inflate performance, justify unauthorized payments, or misrepresent the use of funds. Fraud also includes the submission of inaccurate or deceptive claims to clients, partners, regulators, auditors, or stakeholders, as well as the knowing use of false identities, inflated costs, duplicate billing, ghost vendors, fabricated services, or misclassified expenditures. Any person who knowingly facilitates, conceals, or benefits from such conduct shares responsibility for the violation. In addition, **the laundering, channeling,**



disguising, or integrating of proceeds derived from unlawful or unethical activity through CILC accounts, projects, or counterparties is expressly prohibited. CILC will not tolerate the misuse of its systems as a vehicle for concealment, evasion, or financial disguise. **Every record must be truthful, complete, timely, and capable of independent verification.**

D. Conflicts of Interest

Conflicts of interest, whether actual, potential, or perceived, must be identified, disclosed, and managed with complete transparency. No person may participate in, influence, review, recommend, approve, or oversee any matter in which they, or any related party, may have a personal, financial, professional, familial, or other interest capable of affecting, or appearing to affect, their impartial judgment. A conflict exists not only where improper influence is proven, but also where circumstances create a reasonable basis to question independence, objectivity, or loyalty to CILC's interests. This includes, without limitation, decisions involving **relatives, household members, close personal associates, outside employers, business partners, competitors, suppliers, contractors, grantees, or organizations in which the individual holds a direct or indirect interest.** Employment of relatives in reporting, supervisory, procurement, finance, audit, or approval functions is prohibited where it compromises independence, creates divided loyalties, or undermines the integrity of decision-making. Likewise, no person may fail to disclose **secondary employment, side businesses, board memberships, consulting arrangements, financial holdings, or any other external interest** that could reasonably intersect with CILC responsibilities. Disclosure must be made **promptly, fully, and in writing**, and the affected individual must **recuse themselves immediately** from any related discussion, decision, access, or approval unless and until the conflict has been formally assessed and cleared through the proper governance process. The obligation to disclose is ongoing; it does not end after initial hiring or onboarding. **Silence does not cure a conflict. Concealment aggravates it.**

Any violation of this section may result in **immediate disciplinary action**, including suspension, reassignment, termination of engagement, contract cancellation, recovery of losses, referral to law enforcement or regulatory authorities, and any other remedy available under CILC policy, contract, or applicable law. **No rank, relationship, urgency, or operational benefit may excuse corrupt or dishonest conduct.** CILC requires not only compliance with the law, but adherence to the **highest standard of ethical conduct, transparency, and fiduciary discipline.**

III. PREVENTION MEASURES

A. Due Diligence

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil shall maintain a **risk-based, documented, and continuously updated due diligence framework** designed to prevent the engagement, retention, or employment of persons or entities that may pose corruption, money laundering, terrorism financing, sanctions, reputational, or integrity-related risks. Due diligence is not a formalistic exercise; it is a **substantive control mechanism** intended to ensure that the organization acts only with persons and counterparties whose identity, legitimacy,



financial standing, ethical conduct, and compliance history have been properly assessed and verified.

Prior to any employment offer, appointment, consultancy engagement, or contractual relationship, the organization shall conduct **pre-employment and pre-engagement vetting** proportionate to the role, the level of access to sensitive information, financial authority, procurement influence, and exposure to external stakeholders. Such vetting shall, at a minimum, include **identity verification, reference verification, review of employment history, assessment of declared qualifications, and background screening** to the extent permitted by applicable law. Where local law allows, and where the sensitivity of the position justifies enhanced scrutiny, the organization may also assess criminal, disciplinary, regulatory, and integrity-related records. Any inconsistency, omission, unexplained gap, or adverse finding shall be escalated for review before any final decision is taken. **No appointment or engagement shall proceed where material risk remains unresolved.**

All staff shall be subject to **annual AML/CFT screening and integrity review**, regardless of seniority, function, or geographic location. Such screening shall include ongoing verification against applicable risk indicators and internal watchlists, with particular attention to changes in role, access rights, financial responsibility, or external affiliations that may increase exposure to abuse. Employees occupying positions of trust, including but not limited to finance, procurement, contracts, compliance, project management, client relations, and senior leadership, shall be subject to **enhanced periodic review**. The organization shall preserve a clear audit trail of screening activity, findings, escalation decisions, and remedial actions, so that compliance can be demonstrated objectively and without ambiguity.

All business partners, vendors, consultants, intermediaries, agents, subcontractors, and other third parties shall be subjected to **sanctions screening and counterpart due diligence** before any business relationship is established and on a continuing basis thereafter. Verification shall include, at minimum, review against **United Nations, OFAC, European Union, and relevant national authority sanctions lists**, as well as any other lists or restrictions applicable in the jurisdictions in which the organization operates or transacts. Due diligence shall also include assessment of beneficial ownership, corporate registration data, financial viability, litigation history, media adverse information, politically exposed person status where relevant, and any indicators of opaque control structures or improper influence. **A person or entity shall not be engaged where ownership, control, legitimacy, or source of funds cannot be adequately verified.**

Where risk indicators are identified, the organization shall apply **enhanced due diligence** and may require documentary evidence, additional declarations, management approvals, contractual safeguards, or continued monitoring. **The burden of clarification shall rest with the counterparty** to the extent necessary to establish transparency and trustworthiness. Failure to cooperate, concealment of relevant information, or provision of false, misleading, or incomplete information shall be treated as a serious compliance concern and may result in immediate disqualification, contract suspension, termination, or reporting to competent authorities where required by law.



B. Procurement Controls

The procurement function shall operate under **strict integrity, transparency, traceability, and segregation-of-duties requirements**. No procurement action shall be undertaken outside authorized procedures, and no individual shall be permitted to control a procurement transaction from initiation to completion. The purpose of these controls is to eliminate concentrated authority, reduce the risk of favoritism or collusion, and ensure that every purchasing decision is defensible, competitive, and properly documented.

For contracts exceeding **USD 10,000**, the organization shall obtain **a minimum of three independent quotes or competitive offers**, unless a documented exception is approved in advance by authorized management on the basis of objective necessity, market limitation, emergency, or sole-source justification. Such exceptions must be narrowly construed and supported by written evidence. Competitive bidding shall not be treated as a mere procedural step; it is a **fundamental safeguard against inflated pricing, undisclosed conflicts of interest, bid manipulation, and improper vendor favoritism**. All bid evaluations shall be based on pre-established criteria, including quality, price, delivery terms, compliance history, capacity, and financial reliability, and not on personal relationships, informal pressure, or undisclosed inducements.

The organization shall maintain **strict segregation of duties** across requisition, review, approval, payment, and reconciliation. No single individual shall be permitted to create a purchase request, approve the same request, authorize payment, and reconcile the resulting transaction. Financial and procurement powers shall be divided so that each stage of the process is subject to independent oversight. Where staffing limitations make full segregation difficult, compensating controls shall be imposed, including secondary approval, periodic management review, after-the-fact audit testing, and exception reporting. **Any concentration of authority that could enable concealment, self-dealing, or unauthorized expenditure is prohibited.**

Supplier selection and retention shall include **formal supplier evaluation**. Every supplier shall be assessed not only for price and capacity, but also for compliance maturity, legal standing, ownership transparency, financial transparency, operational integrity, and willingness to meet contractual compliance obligations. Evidence may include compliance certifications, anti-corruption commitments, tax and registration status, financial statements, references, and declarations concerning sanctions, labor practices, subcontracting, and conflicts of interest. Suppliers that refuse reasonable transparency, provide inconsistent information, or exhibit unexplained financial opacity shall not be approved. The organization shall retain the right to suspend or terminate any supplier relationship where credible compliance concerns arise, regardless of commercial convenience. **Commercial expediency shall never override legal or ethical integrity.**

All procurement records shall be complete, accurate, contemporaneous, and retained in accordance with recordkeeping requirements. Deviations, sole-source awards, emergency purchases, unusual pricing, split purchases, or repeated awards to the same counterparty shall be reviewed with



heightened scrutiny. **Patterned irregularities are not administrative errors; they are indicators of control failure and potential misconduct.**

C. Gift & Entertainment Policy

The organization adopts a **strict zero-tolerance approach to improper gifts, hospitality, and entertainment**. No gift, favor, payment, benefit, hospitality, or entertainment may be offered, promised, requested, received, or retained if it could reasonably be perceived as intended to influence judgment, secure preferential treatment, reward a decision, or create an obligation. The key standard is not merely actual impropriety, but also the **appearance of impropriety**, because even the perception of compromised integrity can damage trust, expose the organization to liability, and undermine operational legitimacy.

Gifts with a monetary value exceeding **USD 50** are **prohibited**, except where a specific exception is expressly authorized in writing under a controlled process and only where permitted by applicable law and internal compliance standards. Even where value is below this threshold, gifts are permissible only if they are modest, infrequent, culturally appropriate, unsolicited, and fully transparent. Any permitted gift must be recorded in the relevant register, including the identity of the giver, the recipient, the date, the estimated value, the business context, and the approving authority if applicable. **Undisclosed gifts are unacceptable regardless of value.** Repeated low-value gifts, when considered cumulatively or in pattern, may indicate an attempt to influence and shall be treated accordingly.

Entertainment and hospitality expenses require **prior approval and a documented business justification**. Legitimate business hospitality must be reasonable in frequency, modest in scope, and directly connected to an identifiable organizational purpose. Luxury, lavish, excessive, or repeated entertainment is strictly forbidden, as is any hospitality that may be interpreted as an inducement, reward, or concealment of a quid pro quo arrangement. Accommodation, travel, premium services, personal benefits, and entertainment without a clear and lawful business purpose are outside acceptable practice. The organization shall not subsidize or participate in hospitality arrangements that are inconsistent with prudent stewardship, ethical conduct, or public confidence.

Any gift, benefit, or hospitality received from clients, suppliers, contractors, intermediaries, or any party seeking or maintaining business with the organization must be **immediately reported** to the appropriate supervisor or compliance function. Where acceptance is not clearly permissible, the item shall be declined, returned, donated, or otherwise disposed of in accordance with internal instructions and applicable law. **Employees have no discretion to quietly retain prohibited benefits.** Failure to disclose, delay in reporting, or concealment of such items constitutes a serious breach of trust. The organization shall maintain a dedicated register and retain oversight to detect patterns, repeat senders, or relationships that may indicate improper influence.

No person acting on behalf of the organization may use gifts, entertainment, or hospitality as a means of gaining access, securing concessions, influencing procurement, avoiding scrutiny, or



creating dependency. **Integrity requires restraint, transparency, and measurable accountability, not social convenience.**

D. Training & Awareness

The organization shall implement a **mandatory, role-sensitive, and continuously reinforced anti-corruption training program** for all personnel. Training is not a symbolic exercise; it is a core control designed to ensure that every employee understands the standards of conduct, the practical operation of the policy, the legal consequences of misconduct, and the personal responsibility each individual bears for preserving institutional integrity. **No employee may claim ignorance of a rule that has been properly communicated, trained, and documented.**

All staff shall complete **at least four hours of annual anti-corruption training**, supported by assessment and recordkeeping. The training shall include, at minimum, the identification of bribery and facilitation risk, conflicts of interest, procurement integrity, recordkeeping obligations, reporting duties, sanctions awareness, AML/CFT indicators, and safe escalation practices. Completion shall not be deemed effective unless the participant demonstrates a satisfactory understanding through a **quiz, knowledge check, or equivalent assessment**. Where performance is unsatisfactory, remedial training shall be mandatory. Repeated failure to complete training or to demonstrate understanding may result in restrictions on duties, suspension of authority, or other disciplinary action.

Personnel with specialized responsibilities, particularly those in **procurement, finance, compliance, contracting, audit, and senior management**, shall receive **advanced and function-specific training**, supplemented by certifications or externally recognized qualifications where required by the organization. For compliance-sensitive roles, the organization may require familiarity with **ISO 37001 anti-bribery management principles**, internal control standards, and applicable legal frameworks. Such personnel are expected not merely to comply, but to **exercise informed judgment, recognize risk patterns, challenge irregularities, and intervene early** when control weaknesses are detected.

Training shall not be limited to abstract policy reading. It shall include **case study analysis of real-world corruption scenarios**, including procurement manipulation, concealed conflicts, invoice fraud, gift and hospitality abuse, sanctions evasion, third-party misconduct, and failures of oversight. The purpose of such analysis is to cultivate judgment, reinforce moral clarity, and ensure that staff can identify the warning signs of misconduct before damage occurs. The organization shall ensure that training content is updated periodically to reflect new legal developments, emerging corruption typologies, jurisdictional risks, and lessons learned from internal or external incidents.

Senior leadership shall visibly support the training program and demonstrate that **compliance is a leadership obligation, not merely an employee obligation**. A culture of prevention cannot exist where leadership tolerates shortcuts, ignores red flags, or treats training as an administrative burden. Accordingly, the organization shall promote continuous awareness through periodic



reminders, policy attestations, targeted communications, and practical compliance guidance.
Prevention is a standing duty, not a one-time event.

IV. REPORTING & INVESTIGATION

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil maintains a strict, zero-tolerance framework for the reporting, review, and investigation of any suspected corruption, bribery, kickback scheme, financial impropriety, abuse of authority, concealment of misconduct, or any other conduct inconsistent with applicable law, internal policy, or ethical duty. Every employee, contractor, consultant, representative, and affiliated party is under a **personal and immediate duty** to report any actual, suspected, attempted, or reasonably perceived act of corruption without delay, hesitation, concealment, or informal handling.

- **All suspected corruption must be reported immediately** to the **Chief Compliance Officer** at info@cilclegal.org or through the **Ethics Hotline**, which operates **confidentially and continuously, 24/7**. Reports must be made in good faith and should include all available facts, names, dates, locations, supporting documents, communications, transactions, or other relevant indicators, even where the reporting individual does not yet possess complete evidence. **A reasonable suspicion is sufficient to trigger reporting obligations**; no one is permitted to wait for certainty, formal proof, or managerial approval before raising concerns.
- **Anonymous reporting is expressly supported and protected** through a secure online reporting platform designed to preserve confidentiality to the fullest extent permitted by law and operational necessity. The organisation recognises that fear of exposure can suppress disclosure of serious misconduct; therefore, **anonymous submissions will be received, recorded, assessed, and escalated with the same seriousness as identified reports**. Where anonymity is maintained, the reporting individual is encouraged to provide sufficient detail to permit meaningful review, including timelines, financial references, counterparties, communications, and any supporting evidence that may assist in an impartial assessment.
- **Retaliation in any form is strictly prohibited and will not be tolerated under any circumstances**. No person may be dismissed, demoted, suspended, threatened, harassed, isolated, penalised, blacklisted, reduced in responsibility, disadvantaged in compensation, or otherwise harmed for making a report in good faith, cooperating with an investigation, refusing to participate in misconduct, or seeking guidance concerning suspected corruption. **Protection for whistleblowers is mandatory**, and any conduct that could reasonably be interpreted as retaliation, intimidation, obstruction, or adverse treatment will itself be treated as a serious disciplinary breach and may also constitute a separate violation of law. Good-faith reporting is protected even where an allegation is ultimately unsubstantiated, provided the report was made honestly and without malicious intent.
- **Investigations shall be conducted independently, rigorously, and without interference**. Where the nature, sensitivity, or gravity of the allegation requires independence, Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil will appoint **external auditors, forensic specialists, or other independent professional**



investigators with no actual or perceived conflict of interest. Investigations will be conducted in accordance with the principles of **confidentiality, due process, evidence preservation, chain-of-custody integrity, document retention, and procedural fairness**. The investigation team may review records, communications, transaction histories, access logs, approvals, travel documentation, procurement files, and any other materials reasonably necessary to establish the facts. **Findings shall be documented in a formal written report** and communicated, as appropriate, to the Board of Directors (Comisión Directiva), senior management on a need-to-know basis, and **relevant regulatory, enforcement, or other competent authorities** where disclosure is required by law, contract, or mandatory reporting obligation. Where misconduct is substantiated, corrective measures may include disciplinary action, contract termination, recovery efforts, control remediation, disclosure obligations, and referral to civil or criminal authorities.

No person shall obstruct, misrepresent, conceal, destroy, alter, or withhold information relevant to a report or investigation. Any attempt to interfere with the reporting or investigative process will be treated as an aggravated compliance violation and may result in immediate sanctions, including termination of employment or contract, and notification to relevant authorities. **Integrity of process is non-negotiable**, and all personnel are expected to cooperate fully, truthfully, and promptly with any lawful internal or external inquiry.

V. SANCTIONS

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil maintains a zero-tolerance enforcement posture toward conduct that violates applicable law, internal policy, contractual obligations, professional ethics, confidentiality duties, conflict-of-interest rules, anti-fraud controls, safeguarding standards, or any other enforceable obligation owed to the Organization. Sanctions under this Section are intended not merely to punish misconduct, but to **protect the integrity of the Organization, preserve institutional trust, deter recurrence, ensure accountability, and secure full remedial relief where harm has occurred**. All disciplinary and remedial measures shall be applied in a manner that is **lawful, proportionate, documented, and procedurally fair**, while preserving the Organization's right to take immediate protective action where the facts, the gravity of the violation, or the risk of ongoing harm so require.

Where a first violation is established, the default response shall ordinarily consist of a **formal written warning**, together with **mandatory retraining**, re-certification, or corrective instruction tailored to the nature of the breach, and a **monitoring or probationary period of six (6) to twelve (12) months**. During this period, the individual or entity concerned may be subject to enhanced oversight, heightened reporting obligations, restricted access to sensitive information, closer supervisory review, and any other reasonable control measures necessary to prevent recurrence. The purpose of this stage is not leniency, but **measured correction under strict accountability**. A first offense may be treated more severely where the breach involves dishonesty, concealment, retaliation, misuse of funds or data, abuse of authority, deliberate non-disclosure, or any conduct that exposes persons, operations, reputation, or legal standing to material risk.



For **subsequent violations, repeated misconduct, or any breach demonstrating wilful disregard, bad faith, or material harm**, the Organization may impose **suspension for a period of one (1) to three (3) months**, removal from assigned duties, suspension of access rights, or **termination for cause**. The Organization shall determine the appropriate sanction based on the totality of circumstances, including the seriousness of the act, the degree of intent, prior history, cooperation during investigation, the existence of aggravating or mitigating factors, the extent of loss or exposure caused, and the necessity of immediate institutional protection. **Progressive discipline is not guaranteed** where the conduct is severe enough to justify immediate termination or referral to authorities. In such cases, the Organization may bypass intermediate measures and proceed directly to the most serious available sanction.

Where the misconduct gives rise to financial loss, operational damage, reputational injury, contractual breach, unauthorized enrichment, or any other compensable harm, the Organization shall pursue **full legal and equitable remedies to the maximum extent permitted by applicable law**. These remedies may include **civil recovery of damages**, restitution, disgorgement, repayment, indemnification, set-off, preservation of evidence, injunctions, and other protective orders. Where the facts disclose potential criminal conduct, including but not limited to fraud, theft, embezzlement, falsification, bribery, corruption, obstruction, cyber-related offenses, or unauthorized disclosure of protected information, the Organization may **refer the matter to law enforcement, regulatory bodies, prosecutorial authorities, or other competent institutions**, and may cooperate fully with any lawful inquiry. The Organization may also seek **asset restraint, freezing, attachment, forfeiture, or seizure**, or equivalent measures, **where available under law and supported by competent process**.

For suppliers, contractors, consultants, agents, intermediaries, or other third parties, violations may result in **immediate suspension of work, termination of the commercial relationship, formal debarment for a period of three (3) to five (5) years, and placement on the Organization's internal exclusion database**. Such listing shall be used to prevent future engagement and to ensure consistent procurement integrity across the Organization and its affiliated operations. In severe cases, debarment may be accompanied by notification to relevant counterparties, funding partners, procurement units, or oversight bodies, subject to applicable law and confidentiality obligations. **No supplier or contractor may be retained where trust has been irreparably compromised, where the entity has demonstrated systemic non-compliance, or where continued engagement would expose the Organization to unacceptable legal, ethical, or operational risk.**



All sanctions under this Section are **cumulative and non-exclusive**. The Organization reserves the right to combine disciplinary, contractual, financial, administrative, and legal measures where warranted by the facts. Nothing in this Section limits the Organization's authority to take **interim protective action**, including access restriction, reassignment, suspension pending investigation, evidence preservation orders, or emergency disengagement, where necessary to safeguard personnel, information, assets, stakeholders, operations, or legal interests. **Every violation will be treated as a serious matter; deliberate misconduct will be met with decisive consequences; and no individual or entity is entitled to assume impunity, tolerance, or informal resolution in the face of proven wrongdoing.**

Signed by:

Dzianis Limarau

President, Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Date: 11 September 2026