CONSEJO INTERNACIONAL
PARA LA LUCHA CONTRA LA CORRUPCIÓN

Financial Transparency Policy

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Preamble

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil ("CILC" or "the Association") regards financial integrity as a fundamental condition of its legitimacy as a non-profit civil association and as a counterparty of public and private institutions. Every financial resource entrusted to or generated by the Association shall be managed with **accuracy, completeness, lawfulness, and verifiability**. No transaction, however minor, is exempt from the standards of documentation and oversight established in this Policy.

This Policy applies to all directors, managers, employees, and any person authorized to commit, spend, record, or report the Association's funds, and it governs all accounts, assets, revenues, expenditures, and financial records of the Association.

I. Books, Records, and Accounting Standards

The Association maintains complete and accurate books and records in accordance with applicable Argentine accounting and corporate law, including the Civil and Commercial Code of the Nation, the regulations of the Inspección General de Justicia (IGJ), and the professional accounting standards issued by the Federación Argentina de Consejos Profesionales de Ciencias Económicas (FACPCE), and with applicable tax and social security legislation administered by ARCA (formerly AFIP) and, at the local level, AGIP. Annual financial statements (estados contables) shall be prepared for each fiscal year ending 31 December, signed as required by law, and made available to the members (asociados) in accordance with the Association's statutes.

- **Truthful recording.** Every transaction shall be recorded accurately, in the correct period, with supporting documentation (invoices, contracts, receipts, remitos, bank records) sufficient to permit independent verification from source document to financial statement.
- **No off-book activity.** Undisclosed or unrecorded accounts, funds, assets, or liabilities are strictly prohibited, as are false, misleading, or artificially split entries and the backdating or falsification of any document.
- **Invoicing discipline.** All sales and purchases shall be documented through legally valid electronic invoices and receipts in accordance with ARCA regulations. The issuance or knowing acceptance of apocryphal or inaccurate invoices is prohibited.

II. Internal Controls and Authorization

Financial commitments and payments require authorization consistent with the authority conferred by the Association's articles and by the President. The Association applies segregation of duties to the extent practicable for its size, so that no single person can initiate, approve, record, and reconcile the same transaction without oversight. Bank accounts shall be operated only by authorized signatories; reconciliations shall be performed regularly; and cash handling shall be minimized, documented, and subject to defined limits.

III. Tax and Payroll Compliance

The Association shall determine, declare, and pay in full and on time all applicable national, provincial, and municipal taxes and social security obligations, including VAT (IVA), income tax, gross receipts tax (Ingresos Brutos), and employer contributions declared through Form F931 and the Libro de Sueldos Digital. All personnel shall be lawfully registered; unregistered or under-declared employment is prohibited. Payroll, including the statutory aguinaldo (SAC), shall be liquidated and declared in accordance with the Ley de Contrato de Trabajo No. 20.744 and related legislation.

IV. Procurement and Contract Integrity

Purchases of goods and services shall be made on the basis of legitimate business need, appropriate comparison of offers where proportionate, and documented approval. Pricing, cost estimates, reports, and claims submitted to clients, including public-sector clients, shall be truthful and supported by records. The submission of inflated, duplicative, or fictitious costs is strictly prohibited. Conflicts of interest in purchasing or contracting decisions must be disclosed and managed in accordance with the Code of Ethics.

V. Transparency Toward Clients, Auditors, and Authorities

The Association shall respond truthfully, completely, and within required timeframes to lawful requests for financial information from clients under contract, external auditors and accountants, tax and regulatory authorities, and courts. No employee may obstruct, delay, or mislead an audit, inspection, or verification. Financial information provided in tenders, supplier registrations, and prequalification processes, including registrations with United Nations bodies and public procurement registries, shall faithfully reflect the Association’s books.

VI. Fraud Prevention and Reporting

The Association operates a zero-tolerance approach to fraud, theft, embezzlement, misappropriation, and falsification of records, as further developed in the Anti-Corruption and Bribery Policy and the Anti-Money Laundering Policy. Any person who becomes aware of a suspected financial irregularity must report it promptly through the channels established in the Whistleblowing Policy, including **info@cilclegal.org**. Reports made in good faith shall not give rise to retaliation. Confirmed violations will result in disciplinary and contractual measures and, where appropriate, referral to the competent authorities and pursuit of recovery.

VII. Responsibilities and Review

The President is responsible for the implementation of this Policy, for engaging qualified external accounting support, and for ensuring that financial obligations are met. This Policy shall be reviewed at least annually and whenever material changes occur in the Association's activities or in applicable law.

Signed by:

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

Date: 11 September 2026