# **Center for Economic Analyses – CEA**

## Anti-corruption policy

Center for Economic Analyses – CEA





WE ARE MAKING A DIFFERENCE

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### **Center for Economic Analyses' (CEA) Anticorruption policy**

#### No tolerance on corruption

This policy document describes how CEA works to prevent corruption or financial irregularities. This policy does not prevent CEA staff or partners from reporting corruption or financial irregularities to the public authority with powers to handle the subject.

CEA takes a no tolerance approach to corruption and financial irregularities. CEA does not tolerate corruption in relation to any of our work and requires that all suspicions of corruption thought to be in breach of this policy are reported.

CEA takes suspicions of corruption seriously, and will assess, act upon, and discipline any case as appropriate in a professional, transparent and fair manner.

Compliance with this policy is mandatory for staff, implementing partners, contractors and related third parties.

Failure to comply will result in disciplinary action up to and including the possibility of termination of employment or party's contract and/or business relationship with CEA.

The steps to be taken will be considered on a case-to-case basis, depending on the type of non-compliance, the amount involved, the wording of the agreement and the likelihood of recovering the funds.

#### **CEA's values and principles**

At CEA, we believe in conducting our work ethically and honestly. We adhere to the values and principles set forth in the Code of Ethics of CEA and we are in compliance with the laws and regulations applicable to the respective contexts in which we work.

Our work is grounded on the principles of transparency and accountability, respect and equality, impartiality, and independence.

CEA works with funds and other resources entrusted to the organisation for efficient, accountable, and transparent use in our operations. We have an obligation to the donors to ensure that these funds and resources and our activities are not subject to corruption.

Any direct or indirect involvement in corruption poses a serious threat to the integrity and credibility of CEA, endangering our ability to maintain our values and to work according to our principles.



Preventing corruption is a priority and a requirement for all staff, implementing partners, contractors and related third parties.

Through this anticorruption policy CEA aims to eliminate corruption from our work, advise partners on how to avoid corruption, and support fight against corruption.

#### Corruption definition, financial irregularities

CEA defines corruption as any form of fraud or serious misconduct in accordance with our Ethics code.

This definition is not limited to interactions with public officials and covers both active and passive corruption, as well as monetary and non-monetary corruption.

This definition includes, but is not limited to, forms of corruption such as: facilitation payments, bribery, gifts constituting an undue influence, kickbacks, favouritism, cronyism, nepotism, extortion, embezzlement, misuse of confidential information, theft, and various forms of fraud.

Conflicts of interest arise from situations in which a person has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of their functions and/or decision making.

#### Anti-corruption culture and practices

CEA is committed to ensuring that everyone subject to this Anticorruption Policy understands the consequences of violating the policy and duty to report all suspicions of corruption.

All staff members, implementing partners, and beneficiaries are obliged to familiarize themselves with our Code of Ethics and principles of work and have a duty to report evidence or suspicions of a breach of the code in terms of the standards and behaviour required.

Failure to comply will result in termination of the violating party's contract/grant agreement/or business relationship with CEA. Staff members are committed to staying accountable and transparent, upholding CEA's values and integrity, following internal formal procedures and policies, and safeguarding CEA's entrusted means.

Staff members are prohibited from engaging in corrupt activities that would compromise CEA's image and integrity, both in their work and in their private life. Failure to comply will result in disciplinary action up to, including the possibility of termination of employment and membership.

#### Compliance and corruption risk management

CEA's corruption risk-management approach is based on personal and organisational integrity, accountability and transparency.



CEA is committed to knowing and understanding the anti-corruption laws and regulations applicable to its projects and the areas in which it operates.

CEA staff comply with the laws of the country(ies) in which they are operate as well as the rules and regulations of CEA's donors and applicable international anti-corruption legislation and conventions.

CEA management will review this Anticorruption Policy occasionally when need arises with respect to legal and regulatory developments and to the actual project framework to ensure compliance and best practice.