



Anti-Fraud and Anti-Corruption Policy

- **Approved by:** The Board of Nordic Impact
- **Adoption Date:** 29 January 2017
- **Most Recent Approval Date:** 25 February 2026
- **Period of Validity:** Until Further Notice



Introduction

The purpose of this Policy is to ensure that all incidents of fraud and corruption are identified, prevented, and addressed in an appropriate and timely manner.

This Policy applies to the Nordic Impact Board, all employees, and all paid and unpaid consultants, contractors, interns, and volunteers who provide goods, services, or support to Nordic Impact or represent the organization in any location, whether within or outside Sweden. For the purposes of this Policy, all such persons are collectively referred to as “employees.”

The term “Nordic Impact Board” refers to Nordic Impact Sweden, as elected by the General Assembly to oversee the organization’s strategic and operational matters.

This Policy also applies to Nordic Impact’s partners, vendors, and other third parties where it is included or referenced in relevant agreements, contracts, memoranda, purchase orders, or tender documents. Nordic Impact is committed to acting professionally, fairly, and with integrity in all its dealings and relationships. The organization applies the highest standards of openness, transparency, and accountability and adopts a zero-tolerance approach to fraud, bribery, and corruption.

Fraud, bribery, and corruption disproportionately harm the poor and most vulnerable communities. Such misconduct diverts resources intended for humanitarian assistance and development, increases the cost of essential services, and undermines economic growth and good governance.

This Policy provides clear definitions of fraud, bribery, and corruption and sets out the responsibilities of all Board members, management, and employees to prevent, detect, and report misconduct. The Nordic Impact Board and Senior Management are committed to ensuring effective implementation of this Policy, including appropriate training, support, and oversight.



Who does this apply to?

This Anti-Fraud and Anti-Corruption Policy applies to Nordic Impact Board members, employees, volunteers, consultants, contractors, and all implementing partner organizations.

Partner organizations implementing projects on behalf of Nordic Impact, including partners operating in high-risk and fragile contexts, are required to comply with this Policy or demonstrate equivalent anti-fraud and anti-corruption policies approved by Nordic Impact.

Compliance with this Policy is a mandatory condition in all partnership agreements. Partner organizations are required to ensure that their board members, management, staff, volunteers, and contractors are informed of and adhere to this Policy.

Failure to comply with this Policy may result in corrective measures, suspension of funding, termination of agreements, and/or reporting to relevant authorities or donors, in accordance with contractual obligations.

DEFINITIONS

What is Fraud?

Fraud is used to describe a range of illegal activities. These include, but are not limited to, deception, forgery, theft, the false reporting or concealment of material facts, collusion, and corruption (including bribery), and undeclared conflicts of interest (please see Nordic Impact's Conflict of Interest Policy).

Examples of fraud other than bribery include, but are not limited to:



- Theft of money, property, or assets
- Inappropriate use of organization assets
- Submitting false expense claims
- Forging, tampering with, or falsely creating documents or records
- Destroying or removing documents or records
- Knowingly creating or distributing false financial information or reports
- Engaging in bribery or corruption
- Deliberately ignoring or acquiescing in fraudulent activity

What is Bribery & Corruption?

Bribery and corruption have a range of definitions in law. The following is a plain language guide:

Bribery: The offering, promising, giving, accepting, or soliciting of money, gifts, or other advantages in exchange for doing something illegal or breaching an employer's trust.

Corruption: The abuse of entrusted power or influence for private gain. Corruption also includes abuse of power or position for personal gain, including Sexual Exploitation, Abuse, and Harassment (SEAH), where individuals misuse authority, trust, or access to resources to exploit or harm others. Such conduct constitutes serious misconduct and may be treated as corruption.

The following are some examples of attempted bribery:

- A potential supplier offers money or a gift to influence a procurement/tender process.
- A job applicant offers payment or a gift to increase his/her chances of being hired.
- A gift (e.g., excessive hospitality) offered to a local official in return for approving a proposal.



- A potential or actual beneficiary offers a payment in return for allowing him/her or their family to be given aid to which they are not entitled.
- A government official asks for a payment to secure an NGO registration.
- A customs official asks for an unofficial payment or gift to release goods.

What is a Facilitation Payment?

The final two bullets above could be examples of facilitation payments, which are usually a bribe in the form of a small, unofficial payment. It is made to secure or expedite the performance of a routine or necessary action to which the person making the payment has a legal or other entitlement.

e.g., an unofficial payment made to a border guard/officer in return for a speedier crossing.

Kickbacks?

Kickbacks are typically payments made in return for a business favor or advantage.

Payments under Duress?

Payments made under duress are in response to demands accompanied by threats to life, limb, or liberty.

What are ‘Gifts and Hospitality’

These can range from small gifts or promotional materials (such as diaries and pens) to expensive hospitality (such as a holiday). Extravagant gifts and hospitality may be thinly-veiled bribes intended to induce improper behavior.

POLICY STATEMENT

Fraud, bribery, or corruption in any form will not be tolerated by Nordic Impact. Where criminality occurs, the loss is not just to Nordic Impact but, much more importantly, to Nordic Impact’s beneficiaries, who are some of the poorest and most vulnerable people in the world. It may also have a major impact on Nordic Impact’s reputation and, consequently, donor confidence in Nordic Impact.

This, again, ultimately impacts our beneficiaries. Nordic Impact will conduct, manage, and monitor all aspects of our work in a way that reduces and hopefully eliminates opportunities for fraudulent or corrupt activity, including the giving or accepting of bribes.



Facilitation Payments and ‘Kickbacks’

All Nordic Impact employees and Nordic Impact Board members must avoid any activity that might lead to a facilitation payment being made or accepted by or on behalf of Nordic Impact. Nordic Impact prohibits the making or accepting of facilitation payments and ‘kickbacks’. If someone suspects a payment request to be solely for the purposes of facilitation, they should ask that a detailed receipt be provided. If there appears to be no legitimate reason for a payment request, it should be explained that Nordic Impact does not make or accept facilitation payments. If a Nordic Impact employee feels it is safe and appropriate to do so, they should ask to speak to the supervisor of the person requesting the payment. If a receipt can be provided and the Nordic Impact employee does not suspect the payment is for the purposes of facilitation, a payment will be allowable.

Payments under Duress

It is permissible for a payment to be made in the rare and exceptional circumstances where it is believed necessary to protect against loss of life, limb, or liberty (except in the case of lawful detention). If possible, the circumstances and proposed payment should be discussed in advance with a line manager. In all such cases, an incident report must be submitted.

Gifts and Hospitality

The giving or receiving of gifts (other than those deemed to be small promotional items) by or on behalf of Nordic Impact is not permitted under any circumstances. Nordic Impact staff and Board members must exercise great caution when offering or accepting hospitality and entertainment.

They must be certain that what is being offered is not designed to gain improper benefit or does not otherwise amount to bribery or corruption.

The providing or accepting of hospitality or entertainment is allowed, as long as:

- It is not done with the intention of influencing the behavior of the recipient;
- It is done openly;
- It complies with local law.

If a member of Nordic Impact staff or Board wishes to offer entertainment or hospitality, it must be authorized by a senior manager in advance.



RESPONSIBILITIES

Nordic Impact Board members, Senior Management, Managers, and employees at every level are responsible for protecting Nordic Impact and the communities we serve from the impact of fraud, bribery, and corruption by always acting in accordance with this policy.

Board of Directors

The Nordic Impact Board of Directors holds ultimate responsibility for ensuring effective anti-fraud and anti-corruption systems, proper internal controls, and a functioning risk management system. Senior management is responsible for the implementation of this Policy, partner compliance, donor reporting, and ensuring that all instances of fraud or corruption are promptly reported to the Board.

Risk Management and Learning

Nordic Impact conducts regular fraud and corruption risk assessments at organizational and project levels. Identified risks are documented, mitigated, and followed up.

Lessons learned from investigations, audits, and reported incidents are used to strengthen internal controls, partner support, and organizational learning.

Fraud and corruption risks shall be assessed prior to entering into new partnerships and before the approval of new projects. This Policy shall be reviewed at least every three (3) years or earlier if operational contexts or donor requirements change.

Senior Staff and Managers

It is incumbent upon Nordic Impact managers and senior staff to set an example by complying fully with Nordic Impact's policies, procedures, and controls. Managers and senior staff are responsible for ensuring that employees under their charge are trained on and fully understand the Nordic Impact Anti-Fraud and Anti-Corruption Policy, and the consequences of non-compliance.

Senior staff and managers must be familiar with and alert to the types of fraud that might occur in their area(s) of responsibility. They must:

- Ensure that this policy and all of Nordic Impact's systems, financial controls, and procedures are fully understood by staff;
- Frequently check that these are being fully observed and implemented;



- Regularly review and, where necessary, update control and procedures

All Employees

It is the responsibility of every Nordic Impact employee to carry out their work and always conduct themselves in such a way as to prevent fraud, bribery, and corruption. All Nordic Impact employees and Board members must be alert to and report any actual or suspected instances of fraud, bribery, and/or corruption.

Responsibility of the Organization

Periodic Risk Assessments: The Nordic Impact Audit and Risk Committee shall regularly (at a minimum, once a year) assess risks, including those covered by this policy; assess, update, and record existing and potential risks to the organization's human and material assets.

REPORTING AND INVESTIGATION

If someone connected to Nordic Impact is offered or asked to pay a bribe, they must refuse and explain that bribery runs totally counter to Nordic Impact's policies. If someone suspects that fraud, bribery, or corruption is, has, or is likely to take place, they must, at the earliest opportunity, report the matter via the line manager and/or the Nordic Impact Whistleblowing Policy. The interests and well-being of those making a report will be fully protected by Nordic Impact's Whistleblowing Policy.

Nordic Impact ensures that whistleblowers acting in good faith are protected from retaliation, discrimination, harassment, or any other adverse consequences as a result of raising concerns under this Policy. Partner organizations are required to inform their board members, management, staff, volunteers, contractors, and relevant stakeholders of available reporting and whistleblowing channels and to ensure appropriate protection for whistleblowers at all levels.

Nordic Impact applies a zero-tolerance approach to fraud and corruption. Any suspected or confirmed case of fraud, corruption, bribery, or other serious irregularities in donor-funded projects shall be reported to the relevant donor and intermediary organization without delay, in accordance with contractual obligations. Reporting to donors shall not be delayed pending the completion of internal investigations.



Failure on the part of a Nordic Impact employee or Board member to report suspicions may lead to disciplinary procedures being instigated, up to and including dismissal and/or legal proceedings.

Knowingly making a false or malicious report constitutes a serious breach of this Policy and may result in disciplinary action in accordance with Nordic Impact's procedures.

Investigations will be conducted in a fair, independent, confidential, and timely manner. Where appropriate, external investigators may be appointed. All findings will be documented, and lessons learned will be used to strengthen internal controls and partner oversight.

TRAINING AND COMMUNICATION

As part of the induction given to new staff and Board members at any Nordic Impact entity, Nordic Impact will effectively communicate and provide training on our Anti-Fraud Policy. Ongoing refresher courses and training on anti-fraud will also be conducted.

ANNUAL APPRAISAL

Completion of training on anti-fraud and ensuring that senior staff (and those under their charge) are compliant with this policy will form part of Nordic Impact's annual performance appraisals.

DISCIPLINARY SANCTIONS

Violations of this policy will be dealt with in accordance with Nordic Impact's Disciplinary Procedure and may result in sanctions, up to and including termination of employment.

ASSOCIATED POLICIES AND PROCEDURES

The Nordic Impact Anti-Fraud and Anti-Corruption Policy is linked to and must be read in conjunction with:

- Nordic Impact Whistleblowing Policy
- Nordic Impact Code of Conduct
- Nordic Impact Conflict of Interest Policy
- Nordic Impact Sexual Exploitation, Abuse, and Harassment (SEAH) Policy

Nordic Impact reserves the right to report any suspected criminal activity to the relevant legal authorities.