

# Policy: Anti-Fraud, Bribery and Corruption

InterClimate Network is committed to a culture of openness and honesty to ensure that the opportunity for fraud, bribery and corruption is reduced to the lowest possible level of risk. If fraud, bribery or corruption occurs, InterClimate Network will deal with it in a firm and controlled manner.

InterClimate Network expects all consultants, contractors and beneficiaries to be fair and honest in their dealings and to provide any help, information and support needed to deal with fraud, bribery and corruption.

All associated with InterClimate Network have a duty to familiarise themselves with the types of impropriety that might occur and to be alert for any indications of irregularity. The Board of InterClimate Network is responsible for ensuring that adequate internal controls exist and that the controls operate effectively.

All associated with InterClimate Network are encouraged to inform the Chair if they suspect a case of fraud.

All information will be dealt with fairly and confidentially. InterClimate Network will do everything possible to protect the identity of anyone reporting suspected fraud and will not disclose their identity without their consent. However, the investigation may reveal the source of the information and a statement by the person reporting suspected fraud may be required as part of the evidence.

InterClimate Network is committed to working and cooperating with other organisations to prevent systematic fraud, bribery and corruption. Where relevant and permissible, information will be exchanged with other organisations without compromising confidentiality.

Breaches of our policy will not be tolerated and could lead to disciplinary proceedings.

This policy is fully supported by the Board and will be monitored and reviewed annually.

## **Financial Conduct and Management**

All associated with InterClimate Network must ensure that they use funds and resources they are responsible for only for the purpose intended, and in a responsible and lawful manner. They should seek to safeguard such funds and resources from abuse, fraud, theft or waste and should strive to ensure value for money for InterClimate Network, its beneficiaries and any public funds.

It is a serious criminal and disciplinary offence corruptly to receive or give any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything or showing favour (or disfavour) to any person or organisation. No one connected with InterClimate Network must use their position to secure any monetary gifts or 'in kind' gifts.

## **Gifts and Hospitality**

In general, all gifts should be refused. However, some discretion may be exercised by the Chair. Any offer of a gift should be reported by e-mail to the Chair, who will decide, based on the nature, value and origin of the gift, whether it should be refused, accepted or donated to charity.

Offers of hospitality, such as lunches and dinners, should be refused, and the Chair should be informed that the offer has been made. Invitations to other events, such as arts or sporting events, etc. should be dealt with in the same way.

## **Procurement**

Anyone involved in procurement of goods or services are perhaps most vulnerable to accusations of impropriety. Even the appearance of impropriety can be highly damaging to the person concerned and to InterClimate Network. It is vital that all purchasing decisions are made on an objective basis, and seen to be so.

All associated with InterClimate Network must exercise fairness and impartiality when dealing with all consultants, suppliers, contractors and sub-contractors. All orders and contracts must be awarded on merit and by fair competition.

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