



Mediterranean Information Office

for Environment, Culture & Sustainable Development

The Mediterranean NGO Federation for Environment and development

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MIO-ECSDE's ANTI-FRAUD/CORRUPTION POLICY

The Mediterranean Information Office for Environment, Culture and Sustainable Development (hereby referred to as MIO-ECSDE), commits to maintain a culture of zero-tolerance towards fraud and unethical activities that threaten the reputation of MIO-ECSDE and its objective of achieving social equity and promoting Sustainable Development in the Mediterranean.

MIO-ECSDE receives funding from a number of external sources. It is crucial to act in conformity with all applicable national and international Rules and Legislation to safeguard proper, ethical, transparent fund management and ensure financial viability.

OBJECTIVES OF THIS POLICY

This anti-corruption policy seeks to ensure transparency and openness. The purpose of the policy is to:

- Define what fraudulent and corrupt behavior is considered by MIO-ECSDE.
- Highlight measures taken by MIO-ECSDE to minimize the risk of fraud or corruption.
- Describe the responsibilities of MIO-ECSDE in preventing, identifying and managing any cases of corruption or mismanagement.
- Set out steps to be taken when fraud is reported.
- Ensure that staff understand and apply the anticorruption policy and the expectations.

DEFINITION OF FRAUD AND CORRUPTION

The terms fraud and corruption are used to describe a whole range of activities like deception, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, abuse of position, concealment of material facts and collusion, favoritism (unfair favoring of one person over another) and nepotism (favoritism towards relatives).

For MIO-ECSDE, fraudulent and corrupt behaviors include:

- Using MIO-ECSDE's funds for goods and services that have not been requested nor delivered.
- Unusual or inadequately documented payments.
- Purchases which have not passed through the normal procedure followed to obtain estimates.
- Unjustified additional benefits and/or entitlements to employees.
- Unjustifiable use of the same consultants/suppliers/subcontractors (unless properly justified and approved).
- Equipment or travel grants provided for individuals without justification.

RESPONSIBILITY AND CORRECTIVE ACTIONS

MIO-ECSDE will promote an anti-fraud/corruption environment by:

- Arranging the necessary "atmosphere" in which to ensure compliance (e.g. there is an understood and accepted "zero-tolerance" rule vis-a-vis fraud/corruption, staff know how and to whom to address their concerns if fraud or corruption is suspected, etc.).
- Making sure the employees of MIO-ECSDE understand this policy, sign annually the Declaration of the Anti-Fraud policy and maintain the conflict of interest register.



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- Integrating the policy into all internal management procedures throughout MIO-ECSDE management structures/resources.
- Continuously updating the Policy in line with current best practice.
- Making certain this Policy, including the “whistleblower” e-mail and address (see below), is readily available to all staff.
- Encouraging the employees who detect, or have reasonable grounds for suspecting, unacceptable conducts, to raise such concerns.
- Ensuring that if fraud occurs, a vigorous and prompt investigation takes place and, where justified, appropriate disciplinary and legal action is taken regardless of the offender’s position or years of service with MIO-ECSDE.
- Taking all appropriate and reasonable steps to recover any financial losses.
- Maintaining a fraud and corruption register.
- Reviewing systems and procedures to prevent similar frauds.

MEASURES TAKEN TO PREVENT FRAUD

- The **internal auditing procedure** ensures that the procedures are properly implemented, effective/efficient and correctly communicated with employees and that records are kept for areas for improvement and nonconformities.
- **Securing funds** is controlled by an internal procedure that clearly states the accepted sources and stresses on maintaining the independence and integrity of the organization.
- Project management adheres to anti-corruption principles (e.g. the **Project Planning procedure** ensures that the annual work plan (listing the ongoing, approved and foreseen projects) is approved annually by the Executive Bureau and the Annual General Meeting and the **Project Monitoring procedure** ensures that each project manager informs the Head Officer/Ex. Secretary on the progress of her/his project including the financial aspects and any deviations).
- Financial control policies are in place (e.g. **Procurement procedure**, four-eye principle for payment approvals, **Payment procedure**, **Compliance requirement of the accounting system procedure** and **Allocating the Annual Budget procedure**).

COMPLAINT MECHANISMS

Internal complaint – whistleblowing

MIO-ECSDE’s board members, managers, staff and interns can confidentially report mismanagement or corruption within the scope of MIO-ECSDE Whistleblowing Policy.

A whistleblower can make the disclosure immediately to his/her line manager. If the claim concerns the line manager or if the whistleblower wishes to remain anonymous, he/she can make the disclosure confidentially to whistleblowing@mio-ecsde.org which will be received by MIO-ECSDE's Integrity Officer.

It should be clear that the disclosure is made within the terms of the whistleblowing policy. This will ensure the recipient of the disclosure realizes this and takes the necessary action to investigate the disclosure and to protect the whistleblower’s identity.



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External complaint

MIO-ECSDE's member organizations and affiliated organizations, partners and the members of the public (individual, company or other entity) can report mismanagement or corruption within the scope of MIO-ECSDE's Complaint Policy.

Disclosures can be made by e-mail to complaint@mio-ecsde.org (having as title "Complaint") or by post to **12, Kyrristou str. 105 56, Athens, Greece.**

MIO-ECSDE commits to protect the privacy of the complainant. Unless it is otherwise requested by him/her, all information will be treated in confidence, and will not be shared with anyone who is not directly involved in the handling of the complaint.

Registering claims

All complaints and confidential reports will be registered in eQual Suite by the Quality Assurance Officer according to MIO-ECSDE's internal procedure "Management of failures-complaints". Unjustified or false/untrue allegations will be clearly reported and communicated as such.

Update

This policy may be periodically updated. The latest version is available on [this page](#) and was published in December 2020. Any changes made are posted here and are effective immediately.