



Baladna – Association for Arab Youth (R.A.)

Anti-Corruption Policy

The Anti-Corruption Policy for Baladna – Association for Arab Youth was approved by the Board of Directors on December 16, 2020.

1. Purpose

This paper seeks to define corruption and the practices included in it in a way that does not contradict legal definitions. It aims to define the Organization's anti-corruption policies and procedures while specifying the responsibilities and processing mechanisms to be applied by the Organization in relation to its employees and beneficiaries.

2. Definition

Corruption is defined by Baladna – Association for Arab Youth as the use of power, authority, trust, and position to achieve private personal gain or to use such authority to grant other related individuals or groups such benefits. Corrupt practices include:

- Accepting and offering personal financial benefits, including offers, grants, acceptances or requests, gifts, loans, commissions, and other material gains.
- Providing and accepting services relating to improving one's reputation, political promotion, increasing influence, sex, and other such services.
- Using financial grants for purposes not stipulated in official agreements, forgery, and fabrication of official documents.
- All practices stipulated in accordance with approved Israeli law in this regard.

Examples of related practices: extortion, bribery, conflicts of interest, embezzlement, commissions, misuse of information, abuse of position, abuse of trust, money laundering, and nepotism.

3. Responsibilities

The responsibility to fight corruption is considered mutual and a joint effort of all the employees and people working under the Organization, including:

- Staff, including the general director, the accounts officer, the accountant, the Board of Directors, and the Supervisory Committee.
- The accountant is responsible for overall internal control and the coordination and implementation of the Anti-Corruption Policy.
- The general director is the reference and principal individual responsible for handling suspicions of corruption related to the staff and other individuals and groups directly related to the Organization's activities.
- In case the director of the Organization or one of the members of the Board of Directors is suspected of engaging in corrupt practices, the processing of her/his file is referred to the Supervisory Committee.

4. Processing Mechanisms:

- Adopting a general anti-corruption policy that is circulated and discussed periodically with all parties and individuals active in the Organization's scope of work, including new employees recruited for jobs.
- Raising awareness of the risks of corruption, its individual repercussions, and its public impact on the Organization.
- Encouraging participation in anti-corruption trainings and trainings on proper management mechanisms among the Organization's various staff members, its Board of Directors, and the Supervisory Committee.

- Encouraging a democratic and participatory working style in follow-up and decision-making, including transparency regarding financial procedures and information, projects and activities, and the Organization's policies and strategies.
- Working to raise the general level of sensitivity to corruption among the actors in the Organization's area of work, including in general dealings that are not related directly to the Organization's work, whether at the level of partnerships, individuals, coalitions, international institutions, and other relevant professional and political intersections.
- Adopting, formalizing, and communicating organizational procedures, policies, roles, and decision-making processes transparently and clearly, including through the circulation of organizational policy papers and the reflection of organizational roles, responsibilities, procedures, and policies in employee work agreements.
- Adopting and applying the Organization's documented policies and procedures as references in the Organization's proceedings and decision-making. These documented policies and procedures include:
 - The Financial Policies and Procedures Manual.
 - The Anti-Corruption Policy.
 - The Anti-Sexual Assault and Harassment Policy.
 - The Organizational Structure and Definition of Roles, which outlines the Organization's organizational structure, decision-making procedures and policies, and the division of responsibilities.
- Employing vigilance and reporting to the designated authority in accordance with the duties approved for combating corruption (as stipulated in this paper), upon sensing any indicators of misconduct, including:
 - Unclear or insufficient policies and procedures to clarify responsibilities and the decision-making process in the project or the Organization / The domination of one person in decision-making / The absence of clear, transparent annual data on the Organization and its projects, including on budgets and disbursements / Lack of qualification on the part of the

accounts officer or accountant / Working under time pressure and providing incomplete unclear answers that reflect confusion / Restriction of information and lack of information flow between the relevant authorities / Scattered rumors from various sources about improper activities and procedures / Sudden and unexplained lifestyle changes.

- Reporting and documenting approaches: Reporting on suspicions of corruption is carried out by the person who senses it to the responsible person, as stipulated in the outline of responsible parties specified above. The exchange is documented through an official form approved for this purpose.
- The responsible party shall approach the exchange by initiating a procedure to verify suspicions through the following steps:
 - Clarifying all indicators of potential corruption reported by the individual reporting suspicion and documenting them in detail.
 - Collecting all relevant indicators of misconduct and documenting them in detail.
 - Involving relevant professional parties in the verification procedure as necessary, including the accounts officer and the accountant, while maintaining confidentiality of the procedure.
 - Comparing indicators with the official policies and procedures adopted by the Organization, taking a position concerning the behavior, and outlining it in an official file that details the allegations and violations.
 - Notifying the suspect of misconduct of the allegations directed against him/her in writing, taking the suspect's statement on the violations attributed to him/her, and documenting the protocol of the session in detail.
 - Taking administrative and legal measures against the act of transgression (general notification, going to the police, legal prosecution to recover financial losses and/or secure compensation for the corrupt act).

- Maintaining a transparent, honest and confidential procedure without disclosing the suspicions to any party outside the scope of those in charge of the verification process.
- Protecting the individual(s) who reported the violations from retaliation and harm and refraining from disclosing their names in cases where they wish for this to be the case.
- Verifying the good will of the individual(s) reporting suspicion of corruption.
- Periodically evaluating the policy and the procedures within it and the extent of the ease and efficiency of its implementation.