


## **Anti-Corruption Policy**

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## Purpose

The purpose of this policy is to articulate Global Fund for Women's ("GFW") commitment to conducting activities in an honest, equitable and ethical manner. This document describes our definition of and response to corruption and related improprieties that occur in pursuing GFW's mission. Questions about this Policy or its applicability to specific circumstances should be directed to the Senior Director of Integrity and Compliance.

## Applicability

This policy applies to all individuals working with GFW, including board members, employees, embedded independent contractors, volunteers, and interns referred to as "Individuals" or "GFW Individuals" in this Policy. It also applies to third parties like grantees, service providers, and other independent contractors working with GFW. In this policy, third party means any individual or organization that engages with GFW, including actual and potential grantees, consultants and contractors, donors, fund holders, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## Policy Statement

Anti-corruption measures are central to safeguarding equity and human rights, ensuring that resources reach marginalized communities without waste, abuse, or compromise. GFW is committed to operating with the highest standards of integrity, accountability, and transparency, aligning with global anti-corruption standards. GFW will always comply with all applicable anticorruption laws and regulations in any country we work. We support the application of this policy by providing:

- Direction and rules to clearly establish appropriate and expected behavior
- Effective deterrents to inappropriate behavior in the form of meaningful consequences
- Prevention measures to reduce the risk of corruption from occurring

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- Detection measures to identify corruption if it happens, including Speak Up channels
- Response measures to ensure we react appropriately to suspicions, allegations, and proven incidents of corruption, including protection and fair treatment for all parties
- Measurement processes to evaluate the impact and success of our anti-corruption policy, and management of risk through the integrity and compliance function
- Deliberate, proactive steps to embed anti-corruption thinking into our culture, including training and awareness

GFW will take appropriate action against any individual who is found to be in violation of this policy. Such action may include progressive disciplinary measures such as warnings, suspensions, and immediate termination of employment, contract, or grant at GFW's sole discretion. Violations also may result in civil or criminal penalties beyond GFW's control.

This policy will be reviewed regularly in accordance with the Development and Approval of Global Fund for Women Policies.

## Anti-Bribery

Bribery often exacerbates systemic inequalities, disproportionately harming women, LGBTQ+ individuals, and other marginalized groups who may already face barriers to accessing resources and services.

GFW employs all legal and safe tactics to avoid paying bribes to public officials, even if this results in denials, delays, inconvenience, or increased costs to our operations. No one is authorized to pay a bribe on behalf of GFW or to use GFW funds to facilitate bribery under any circumstances.

Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. Payments made under coercion or threat to ensure safety are considered extortion rather than bribery. These instances must be reported promptly to the Senior Director of Integrity and Compliance for appropriate follow-up and documentation.

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In contexts where refusal of bribery may hinder urgent human rights interventions, staff are encouraged to prioritize ethical decision-making, document all interactions, and seek immediate guidance from their manager, and the Senior Director, Integrity and Compliance who may consult with Executive Team members, as appropriate.

GFW works proactively to build the capacity of its staff, grantees, and partners to resist bribery by providing scenario-based training, tools for navigating complex systems, and resources for ethical decision-making.

Recognizing that systemic corruption often sustains bribery demands, GFW advocates for structural reforms that promote transparency, gender equity, and accountability at local and global levels.

Any attempted or actual bribery encountered during GFW operations must be reported through designated reporting channels, including GFW's confidential Speak Up line.

Reports will be handled with confidentiality and sensitivity, ensuring protection for those who Speak Up and affected individuals, especially in cases involving gender-based corruption such as sextortion.

## Sexual Corruption

Sexual corruption occurs when a person abuses their entrusted authority to obtain a sexual favor in exchange for a service or benefit that is connected to the entrusted authority. GFW recognizes this as gender-based corruption that poses unique challenges requiring specific safeguards and responses.

Due to the sensitive nature of this type of corruption, it falls under our procedures related to sexual exploitation, abuse, and harassment (SEAH). Matters concerning sexual corruption will be handled in accordance with our Safeguarding Policy. Individuals who are found to be perpetrators of sexual corruption will be summarily dismissed. Please refer to our Safeguarding Policy.

## Conflicts of Interest

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GFW individuals may have pre-existing relationships with individuals and entities working with GFW, potentially creating power imbalances that need to be addressed for fair decision-making.

Identifying and disclosing any actual or potential conflicts of interest that result from these pre-existing relationships and our work is necessary to elevate equality and transparency and maintain integrity and trust in collective decision-making processes.

A potential conflict of interest arises whenever GFW contemplates a decision involving a contractor, service provider, movement committee member, or grantee with which GFW individuals is affiliated.

Affiliation means the close involvement with a contractor, service provider, movement committee member, or grantee on the part of a GFW (a) employee or Board member, or (b) the spouse or partner, parents, or children of an employee or Board member, within one year preceding the decision. The close involvement includes, but is not limited to, serving as a Board member, employee, consultant to, or doing business with the contractor, service provider, movement committee member, or grantee.

A conflict of interest exists where an employee or a Board Member has an interest, relationship, or friendship which could, or could be perceived to, interfere with their ability to decide an issue in the best interests of GFW.

The existence of a conflict of interest does not constitute a breach of policy if it is disclosed and mitigated as soon as possible.

All actual or potential conflicts of interest are to be declared, declared conflicts are subsequently managed to mitigate the associated risks of corruption, and decisions and actions are documented to ensure transparency and accountability.

Examples of conflicts of interest include (but are not limited to):

- Relationships between members of the Executive Team, Finance staff, HR staff, or board members, and any other staff member.
- Relationships between GFW individuals and their direct manager
- Relationships between GFW individuals or board members and grantees, movement committee members, contractors, donors, or job applicants.

Note: A 'relationship' in this context could include family relationship, romantic relationships, financial interests, or acting as an employee, advisor, or board member for another organization that GFW may work with.

Appropriate actions should be taken to resolve a conflict of interest, which may be temporary or permanent, for example:

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- A procurement requestor, approver, or selection committee member is removed from a particular procurement decision in which they are conflicted.
- A member of the Programs or Grants management team is excused from working with a potential or actual grantee with whom they have a conflict.
- Individuals ceases to act as a board member, signatory, or advisor which is causing the conflict.
- Conflicted individuals is removed from all aspects of the position recruitment and selection process.
- One person in a romantic relationship with another GFW individual who is their manager discloses the relationship as required. Appropriate mitigation measures are taken.

## Facilitation Payments

GFW prohibits facilitation payments. A facilitation payment is a small, unofficial payment made to a public official to speed up or ensure routine services, like processing paperwork or granting permits. These payments are considered a form of bribery and conflict with our mission to promote human rights and ethical governance.

Guidance for Individuals and Partners:

- No GFW individuals or partners may make or authorize facilitation payments under any circumstances.
- If refusal of a facilitation payment puts anyone at immediate risk of harm, the payment must be documented and reported to the Senior Director of Integrity and Compliance, as soon as possible.
- All relevant stakeholders will receive training on identifying and handling situations involving facilitation payments, emphasizing alternative ethical actions.
- Any incident involving facilitation payment requests, whether acted upon or not, must be reported to ensure transparency and accountability.

Facilitation payments generally conflict with ethical principles, as they perpetuate corruption and inequities, undermine accountability, and often exploit marginalized populations. However, in complex, high-risk contexts, there might be scenarios where the choice to make a facilitation payment could be framed as an ethical dilemma:

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- **Personal Safety and Protection from Harm:** In settings where women, LGBTQ+ individuals, or other marginalized groups face violence, harassment, or systemic discrimination, refusing to make a facilitation payment might escalate risks to personal safety. For example, at a border checkpoint or in accessing vital services, refusing a payment could lead to physical harm or denial of life-saving assistance.
- **Access to Essential Services:** In cases where the payment directly enables access to urgent healthcare, shelter, or legal recourse for someone at immediate risk, the ethical imperative to protect life and dignity may outweigh the principle of zero tolerance for corruption. Gender-based corruption often manifests in ways that gatekeep resources critical to women and marginalized groups, intensifying the stakes of the decision.
- **Structural Constraints in Fragile Systems:** In fragile or conflict-affected states, where corruption is entrenched and systemic, refusing facilitation payments may mean prolonged delays or exclusion from services disproportionately affecting women and vulnerable populations. The ethical choice in these contexts might be to navigate the system pragmatically to meet urgent needs while working to challenge corruption longer-term.

If a facilitation payment is made, it could only be considered ethically defensible under these conditions:

- **Documented Transparency:** The payment and the circumstances must be recorded and reported internally to prevent misuse and ensure accountability.
- **Commitment to Advocacy:** The act must be coupled with a clear strategy to address the underlying corruption through advocacy, capacity-building, or systems reform.
- **Minimal Power Dynamics:** The payment must not reinforce coercion or perpetuate systemic exploitation; it should reflect a pragmatic response to immediate harm rather than complicity in corruption.

While facilitation payments are almost always problematic, there may be rare contexts in high-risk settings where they can be framed as the least harmful option in a broader ethical dilemma. The focus must always remain on systemic change to eliminate such choices altogether. When a facilitation payment may be deemed necessary, prior written approval from the Senior Director of Integrity and Compliance is required before such payment can be made wherever possible. If not possible, GFW individuals must document the circumstances, action taken, and payment amount in an internal written



memo or email and share the documentation with the Senior Director of Integrity and Compliance as soon as possible.

## **Fraud**

Fraud undermines trust, accountability, and the equitable distribution of resources, directly compromising the mission of Global Fund for Women (GFW) to advance gender justice. In the context of international human rights, fraud - any act of deceit, false representation, or intentional omission to secure an unauthorized benefit- often exacerbates existing inequities, particularly for women, LGBTQ+ individuals, and other marginalized groups. GFW is committed to identifying and dismantling systemic patterns of fraud that hinder equitable access to resources and opportunities.

GFW integrates fraud prevention into its programmatic and operational processes by implementing robust internal controls. Collaborative partnerships, i.e. movement committees and other participatory oversight methods, are leveraged to reduce reliance on individual discretion and mitigate opportunities for fraudulent behavior at the grantee level. At the operational level, GFW implements strict segregation of duties and, relies on established workflows within human resources, finance, learning and evaluation, grants management, development, programs, and process and information workflows to ensure opportunities for abuse are minimized to the extent practicable.

Reporting mechanisms, including confidential Speak Up channels, are accessible and inclusive, ensuring marginalized voices can safely disclose concerns. Please see the Code of Conduct for more on Speaking Up.

## **Gifts, Meals and Entertainment**

Gifts and entertainment should never be used or allowed to influence business decision making.

When offers of gifts and entertainment are made or accepted in situations where they are not appropriate, they can look like, or in fact be, bribes. They can expose GFW to accusations of unfairness, unlawfulness, and risk our reputation among our stakeholders.

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Positive, healthy, normal business practices can include accepting and making offers of gifts and entertainment, which develop and maintain positive and strong business relationships. GFW can accept and make offers of gifts and entertainment ONLY when they are appropriate, i.e. when they:

- are proportionate in the context; and
- do not create any sense of expectation or obligation on the recipient or the giver.

The following gifts may never be offered or accepted and will always be deemed inappropriate.

- Cash of any amount
- Any gift exceeding nominal value (examples of products of nominal value include tote bags, pens, mugs, caps and t-shirts or other novelty, advertising or promotional items)
- Any entertainment worth more than \$100 per person (or equivalent in local currency)
- Any gifts or loans from existing contractors or grantees or prospective contractors or grantees while an open solicitation is underway
- Any gifts or loans to staff involved in contractor/grantee selection decisions (e.g., member of Procurement or Grant Evaluation Committee, members of a GFW supported Movement Committee)
- Entertainment involving gambling, anything of a sexual nature, or exploitation of others.

Gifts or entertainment below the limits stated in this section are not necessarily appropriate. It is all about the intent of the giver. If the gift was given to influence an action, decision, or outcome, then it must be rejected. In some circumstances, an element of judgement is required to decide whether a gift is appropriate or not. If any individuals or Board member is in any doubt, they should consult with the Senior Director of Integrity and Compliance (or the Board Chair in the case of the CEO) and obtain written permission before accepting or offering a gift.

The following circumstances imply the giving or receiving of a gift or entertainment offer may be appropriate:

- The gift or entertainment does not constitute an attempt to apply undue influence, and does not create an undue obligation
- The gift or entertainment is given or accepted in the open rather than in secret
- The gift or entertainment is given to celebrate a recognized cultural event or holiday.

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- The gift or entertainment is given to GFW as an organization rather than to a specific person.
- The gift or entertainment is branded marketing materials (pens, notebooks, etc.)
- The value of the gift or entertainment is not excessive or abnormal in the social context
- The timing of the gift or entertainment is not suspicious

The following circumstances imply the giving or receiving of the gift or entertainment may be inappropriate:

- The timing, nature or circumstances of the gift means it could be perceived as an attempt to influence an action, decision, or outcome
- The value of the gift is excessive in the circumstances despite being below the limit established by this Policy
- The receiver feels obligated, or the giver feels entitled
- The gift is given or received in secret

If any individuals or Board member is offered an inappropriate gift, they should politely decline it and inform the Senior Director, Integrity and Compliance, or Board Chair, as appropriate.

If declining an inappropriate gift in the moment that it is given might be culturally inappropriate or embarrassing or create a reputational risk for GFW, it should be returned within no less than a week whenever possible, with appropriate documentary evidence to prove that the gift was returned. If it is not possible to return an inappropriate gift, a written disclosure will be made to the Senior Director of Integrity and Compliance and VP of Finance, who may escalate the disclosure to the Executive Team for action. In any case, appropriate documentation will be kept by GFW as record of the transaction.

If an inappropriate gift is received publicly, steps should be taken to restore the reputation of GFW, in addition to returning the gift.

If inappropriate gifts are received without consent (such as courier deliveries, bank or mobile money transfers), these should be declared immediately to the Senior Director Integrity and Compliance and Vice President of Finance. Steps should be taken to return the gift or notify authorities if money laundering is suspected.

Inappropriate gifts received by GFW individuals and Board members and subsequently declared to GFW should in all cases be returned.

Appropriate gifts, given to GFW as a whole, or to a particular team, should normally be enjoyed or shared by all relevant individuals (e.g., lights snacks). Where an appropriate

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item is not easily shareable, it should be raffled by some random and transparent means through Human Resources functions.

Individuals who award contracts or grants or who can influence the allocation of business (including grant decisions), who create specifications that result in the placement of business or who participate in negotiation of contracts or grants must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect GFW's reputation for impartiality and fair dealing.

Individuals and Board members may accept occasional meals, refreshments, entertainment, and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesy or entertainment from a grantee or contractor whose contract or grant is expiring soon.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with their manager or coworker or having the courtesies known by the public.

"Business courtesy" means anything of value, a favor, or a benefit provided free of charge or at a charge less than fair market value in the context of a business relationship. A Business courtesy may be a tangible or intangible benefit, including, but not limited to, such items as non-monetary gifts, meals, drinks, entertainment, hospitality, recreation, door prizes, transportation, discounts, tickets, passes, sporting events, side excursions or outings, promotional items, or use of a donor's, contractor's, or grantee's time, materials, or equipment. An employee may never use personal funds or resources to do something that cannot be done with GFW's resources. Accounting for business courtesies must be done in accordance with established procedures.

GFW may provide non-monetary gifts (e.g., company logo apparel or similar promotional items) to organizations with which it does business. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization or GFW policy.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on GFW's books and records.

## **Business Courtesies to Government Officials**

GFW prohibits business courtesies, including gifts, meals, and entertainment to any government officials.

Organizations that do business with the U.S and foreign governments are subject to strict rules regarding gifts to government officials. Noncompliance with these rules may result in both civil and criminal charges for offering any business courtesy to any government official within or outside the U.S. To ensure compliance with these rules, GFW individuals and Board members may not offer any business courtesies to any government employees. If a government employee requests any kind of business courtesy, employees must respectfully decline, explain that GFW policy prohibits them from offering or providing gifts to government officials, and immediately report any such request to the Senior Director of Integrity and Compliance.

A "foreign official" can be essentially anyone who exercises governmental authority. This includes any officer or employee of a foreign government department or agency, whether in the executive, legislative, or judicial branch of government, including law enforcement and whether at the national, state, or local level. Officials and employees of government-owned or controlled enterprises are also covered, as are private citizens who act in an official government capacity like teachers, healthcare providers, etc.

Rules regarding gifts to government officials prohibit offering, promising, or giving "anything of value" to a foreign official to gain an improper business advantage. In addition to cash payments, "anything of value" may include:

- Gifts, entertainment, or other business promotional activities
- Covering or reimbursing an official's expenses including travel relating expenses like airfare, lodging, and meals.
- Offers of employment or other benefits to a family member or friend of a foreign official
- Political party and candidate contributions
- Charitable contributions and sponsorships

Covering the meals of foreign officials, like breakfast or lunch, is discouraged to avoid potentially violating global anti-corruption laws. In these circumstances, GFW individuals should only pay for their portion of the business meal, and the foreign official should cover their portion.

Other less obvious items provided to a foreign official can also violate anti-bribery laws. Examples include in-kind contributions, investment opportunities, stock options or

positions in joint ventures, and favorable or directed contracts. The prohibition applies whether an item would benefit the official directly or another person, such as a family member, friend, or business associate.

Under the law, the whole organization and specific individuals may be held liable for improper payments by an agent or other intermediary if there is actual knowledge or reason to know that a bribe will be paid. Willful ignorance – which includes not making a reasonable inquiry when there are suspicious circumstances – is not a defense, and it does not matter whether the intermediary is itself subject to anti-bribery laws. All GFW individuals, therefore, must be alert to potential “red flags” in transactions with foreign officials.

## **Nepotism – Hiring of Family Members**

To foster an environment in which integrity and objectivity can be maintained, GFW has adopted the following guidelines governing situations where family members work at the organization:

- No individual will participate in the interviewing or evaluating a family member for hire.
- When members of the same family work for GFW, one family member may not supervise another.
- Family members will not be involved in evaluating each other's job performance or in making recommendations for salary adjustments, promotions, or other employment action.

## **Implementation**

GFW implements this Policy through its Integrity and Compliance Program based on appropriate guidance, training, speaking up when something seems not right, listening up when reports or concerns are raised, investigating, learning, and oversight of the same. The Senior Director of Integrity and Compliance is responsible for the program, supported by the executive team of GFW.

The Senior Director of Integrity and Compliance and Vice President of Finance are responsible for giving advice on the interpretation and application of this policy, supporting training and education, and responding to reported concerns. The implementation of this policy includes several key elements that complement one another:

## **1. Corruption and Bribery Risk Assessments**

GFW incorporates the assessment of corruption and bribery risk into standard risk assessment processes. We will consider how corruption might occur in relation to our operations, how our external relationships and internal structures may contribute to the risks, and the mitigation measures needed to manage any identified risks.

## **2. Management of Gifts and Hospitality**

All instances of gifts and hospitality provided or received must be reported by email to the Senior Director, Integrity and Compliance and Vice President, Finance. The information required is:

- When and where was a gift of hospitality provided or received?
- What was the purpose?
- What was the nature (including value) of the gift or hospitality?
- Who was present?

## **3. Management of Conflicts of Interest**

Managing actual or potential conflicts of interest is important to reduce opportunities for potential bias or favoritism to show up in the decision-making processes at GFW. A conflict is not a bad thing; we all have them because we all have relationships with people. What matters is what we do once we identify a potential or actual conflict. All GFW board members, employees, consultants, or agents involved in decision-making processes have a duty to identify and disclose actual or perceived conflicts of interests. On an annual basis, all board members, staff, and long-term contractors are required to declare all private, personal, and financial interests relevant to their duties in relation to:

- Awarding grants
- Awarding contracts
- Purchasing goods and services
- Management of contracts
- Accepting Donations

Upon Hire and when circumstances change, all GFW Individuals must complete a "Disclosure of Relationship Form" to declare any actual or potential conflicts of interest. Forms are reviewed by Human Resources. Where disclosures are made, the disclosure is reviewed by the Senior Director of Integrity and Compliance.

Additionally, the Form needs to be filled out by all members of an advisory committee when participatory grantmaking processes are carried out by Global Fund for Women to disclose potential conflicts of interest by committee members and selected grantees. Where disclosures are made, the disclosure is reviewed by the relevant Project Director.

On an on-going basis, it is the responsibility of the individuals involved in decision-making to identify any conflicts of interest as they arise and submit updated disclosure forms.

Please seek advice from the Senior Director of Integrity and Compliance for guidance on what to declare or whether/when a declaration needs to be updated.

#### **4. Training and Communication**

Individuals will receive scenario-based training on this policy as part of the Integrity and Compliance Program. Anti-corruption training may also be provided to third parties when a need and opportunity is identified.

Our approach to anti-corruption will be communicated to all third parties at the outset of our relationship with them and as appropriate thereafter.

#### **5. Due Diligence**

While we unequivocally reject corruption, we recognize the importance of balancing accountability with compassion. This includes addressing root causes, mitigating harm, and prioritizing restorative measures alongside appropriate consequences for individuals or systems involved. By embedding feminist principles in our anti-corruption efforts, we aim not only to hold ourselves accountable but also to dismantle the systemic inequities that enable corruption.

Due diligence on third parties, including grantees and other partners, can involve assessments of their policies, capacity-building efforts, and the inclusion of mandatory contractual clauses for compliance with anti-corruption standards.

- GFW follows its standard vetting processes for grantees in compliance with our Grant Making Policy.



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- GFW will provide additional support to help grantee partners strengthen their anti corruption policies and procedures when a need and opportunity is identified. Please refer to the Grant Making Policy for more on this topic.
- GFW follows standard vetting processes for contractors and other service providers in compliance with our Procurement Policy.

## Your Responsibilities

You must ensure that you read, understand, and comply with this Anti Corruption policy and related policies referenced herein, including but not limited to: GFW's Safeguarding Policy, Grant Making Policy, Procurement Policy, and the Code of Conduct.

You will participate in training on the topic of anti-corruption, Speaking Up, and the Code of Conduct.

Individuals who breach this policy may face disciplinary action, which could result in dismissal for gross misconduct.

## Red Flags

In the sector in which GFW operates, the following circumstances are areas where risks are most likely, and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

- You become aware that GFW individuals or a third party engages in, or has been accused of engaging in, improper business practices as described in this policy.

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- GFW individuals or a third-party requests payment in cash and/or refuses to sign a formal fee agreement, or fails to provide an invoice or receipt for a payment made
- GFW individuals or a third party offers (or demands) entertainment or gifts before commencing or continuing contractual negotiations or provision of services
- You are offered an usually generous gift or offered undue hospitality by a third party
- You are faced with threats or other harm by senior staff from a partner organization demanding sexual favors in exchange for future collaborations.

## Speaking Up

Global Fund for Women's Speak Up practice is designed to build the confidence of individuals to report genuine concerns about misconduct. For many cases of misconduct, a report is the only way it will be discovered and dealt with. Global Fund for Women encourages all individuals to pay attention, actively listen, and give credence to the voices, opinions, and concerns of others. This culture values open communication, empathy, and inclusivity, promoting an environment where everyone feels heard and respected. Managers are expected to take allegations of misconduct seriously and create an environment where individuals who report such incidents are heard, respected, and supported throughout the process. Managers at any level of the organization who directly observe an incident or receive a report of misconduct must report such information to any of the Speak Up channels established by Global Fund for Women. All individuals, including individual contributors and Managers, receive training on the Code of Conduct, and our Speak Up, Listen Up, and Investigation processes.

If you suspect any wrongdoing by Global Fund for Women, its leadership, or others on its behalf, report it. Report corruption concerns, safeguarding concerns, financial irregularities, and other misconduct, including violations of law or policy related to Global Fund for Women's operations. You can report to your supervisor, any member of the Executive team, or to the Senior Director of Integrity and Compliance. You can also report confidentially to [concerns@globalfundforwomen.org](mailto:concerns@globalfundforwomen.org) and anonymously and confidential to the third-party managed Speak Up Line: <https://globalfundforwomen.navexone.com/>

Global Fund for Women is committed to fostering a safe and inclusive environment and will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation.

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Regardless of position or tenure, anyone found to have engaged in retaliatory conduct against someone who has raised an ethical or compliance concern will face disciplinary action.

If you feel you have been subjected to retaliation, you are encouraged to report it through the Speak Up line or directly contact the Senior Director for Human Resources or Senior Director of Integrity and Compliance.

# Definitions<sup>1</sup>

## Anti-Corruption

A term used to designate the range of approaches to combat corruption. Much broader good governance and democracy-promotion approaches produce similar outcomes, even if they are not explicitly labeled as 'anti-corruption.'

## Bribery

The offer or exchange of money, services or other valuables to influence the judgment or conduct of a person in a position of entrusted power. The benefit does not need to go to the official in question directly – it can go to a spouse, a child, another relative, a friend, or even to the official's political party as a donation. A bribe is sometimes paid after the fact – for instance, in monthly installments to the official issuing permits to street vendors if they are allowed to operate. This form of bribery is called a kickback. Bribery is widely criminalized, and both the party paying the bribe and the party receiving may be liable (see active bribery/passive bribery). However, certain forms of bribery are often exempt from prosecution (see facilitation payments).

## Conflict of interest

A conflict of interest is a conflict between an entrusted duty on the one hand, and the private interest of the duty-bearer on the other. For example, a parliamentarian sitting in the committee for healthcare reform might own stock in a major pharmaceutical company. The existence of this private interest could improperly influence the performance of entrusted responsibilities. Because conflicts of interest create opportunities for corruption to take place, they should be avoided or managed.

## Corruption

The abuse of entrusted power for private gain. Although this is the most fitting definition for our context (international human rights), be aware that other definitions do exist. The World Bank, for example, defines corruption more narrowly as 'abuse of public office for private gain'. All expert/specialist variations nevertheless include three common elements: abuse (misuse, violation) of entrusted power (duty, office, etc.) and private benefit. In everyday language, the term is used more broadly to denote a wide variety of objectionable or immoral acts, and not only those associated with formal duty.

## Cronyism

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<sup>1</sup> Definitions provided by the U4 Anti-Corruption Resource Centre's online course: [Essentials of anti-corruption I: The basics](#)

The favorable treatment of friends and associates in the distribution of resources and positions. The concept is related to the notion of nepotism, where the favorable treatment extends to family members (and also to patronage).

### **Embezzlement**

The misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian. Accountants and financial managers typically have access to an agency's funds and so are able to embezzle them. Other forms of embezzlement include the taking of supplies, equipment, etc.

### **Extortion**

The practice of obtaining something (money, favors, property) through the use of threats or force. For example, extortion takes place when armed guards exact money for passage through a roadblock. Withholding life-saving medical attention unless a bribe is paid could also be considered an act of extortion. See also sextortion which involves threats or force to obtain sexual benefits.

### **Gender-based Corruption**

This is corruption that disproportionately impacts individuals based on their gender, either through direct acts of exploitation or through systemic inequities that shape access to power and resources. Anti-corruption frameworks are often designed without an intersectional lens, meaning they may not account for how women and gender-diverse people experience corruption differently or face greater risks when reporting it. Gender-based corruption refers to both the direct ways in which corruption exploits gendered vulnerabilities—such as sextortion (demanding sexual favors in place of monetary bribes)—and the systemic ways corruption reinforces gender-based exclusion from power, resources, and justice.

### **Facilitation payments**

Refer to relatively small, individual amounts paid beyond the official fees to speed up services such as customs clearance, work permits, border crossings, etc. Technically, these are a bribe. In many countries, however, facilitation payments by companies doing business abroad are exempt from prosecution for bribery in their home countries if they are used to speed up legal processes, rather than to avoid regulations. This exception recognizes the fact that in certain settings, it is impossible to operate a business without conceding to such payments.

### **Fraud**

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An economic crime involving deceit, trickery or false pretenses, by which someone gains unlawfully. Fraud often accompanies corrupt acts, in particular embezzlement, where it is typically used to falsify records to hide stolen resources.

### **Kickback**

A bribe paid after the fact for an undue favor or service. For instance, a company that receives a government contract might send the responsible official regular payoffs for the duration of the contract. Street vendors may pay the permission-granting authority a small sum each month if they are allowed to operate.

### **Nepotism**

A form of favoritism involving family relationships, in which someone exploits his or her authority to procure jobs or other favors for relatives. When this treatment is extended to friends and associates, the appropriate term is cronyism.

### **Passive bribery**

Refers to the act of receiving the bribe. This does not mean the passive briber has taken no initiative – in many cases he or she may have demanded the bribe in the first place.

### **Patronage**

The use of state resources, typically positions of office, to reward individuals for their political support. All political systems contain elements of patronage - for instance, in the appointment of cabinet or ambassador positions to political supporters and allies. When patronage is used excessively and contrary to all principles of merit, it can violate boundaries of legitimate/acceptable discretion and ethical conduct.

### **Petty corruption**

Alternatively called 'administrative' or 'bureaucratic' corruption, the term refers to the everyday corruption that takes place when bureaucrats meet the public. While the sums of money involved tend to be small, they are far from 'petty' for the people concerned. Examples include paying bribes to get an ID, enroll in school or have a phone line installed.

### **Political corruption**

The term is used both narrowly to designate the manipulation of policies, institutions and rules in the financing political parties and in electoral campaigns, and also more broadly as a synonym for 'grand corruption', or corruption taking place at the highest levels of government where policies and rules are formulated and executive decisions are made.

### **Private sector corruption**

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The abuse of professional obligations within a corporation or other non-governmental entity for private gain. For example, private sector corruption occurs when a corporate employee sells commercial secrets to a competitor. The term is also used more broadly for situations where individuals or groups from the private sector influence public officials to take decisions and actions that constitute abuses of entrusted power. One example would be corporations offering bribes to public officials in exchange for favorable legislation or lucrative contracts.

### **Sexual Corruption**

The abuse of power to obtain a sexual benefit or advantage. Related to the concept of extortion.

### **Systemic corruption**

Also known as endemic corruption systemic corruption refers to a situation when corruption is an integral part of a state's economic, social and political system, and where most people have no alternatives to dealing with corrupt officials. Sporadic corruption, in contrast, occurs irregularly and does not compromise the mechanisms of governance in the same crippling way.

### **Trading in influence**

Also known as influence peddling. Trading in influence occurs when a person who has real or apparent influence on the decision-making of a public official exchanges this influence for an undue advantage. The offence is similar to bribery with one important difference: trading in influence concerns the 'middleman', or the person that serves as the go-between the decision-maker and the party that seeks an improper advantage. The final decision-maker may not even be aware of the illicit exchange. One example is when an MP receives a payment from a company to attempt to convince fellow legislators to support amendments that would benefit that company. Trading in influence is difficult to prove because the legal definitions involve disputable criteria of 'intentionality' and 'undue'/'improper' influence. Trading in influence is also often difficult to distinguish from permissible forms of lobbying.