

Anti-Corruption Policy

This **anti-corruption policy** raises awareness of the risks of corruption and its consequences, corrupt behaviour, and possible corruption risks in the future. Furthermore, it outlines how German Sparkassenstiftung for International Cooperation (DSIK) addresses corrupt behaviour as well as internal measures taken to prevent corruption.

Definition of corruption:

DSIK refers to the acceptance and/or the award of gifts by and/or to a private person, organisation or representatives of organisations and governments as corruption. This applies to money, material goods, or other services like facilitation, preferential hiring practices and political donations.

Corruption is prohibited for all staff members of DSIK. Furthermore, DSIK staff is required to notify public authorities about corruption witnessed in relation to its work (e.g., by partner institutions). Local business customs regarding the relationship between DSIK and its partner organisations will be assessed individually according to the national law (e.g. gifts for anniversaries or national public holidays). The provision of gifts, donations, meals, travel, or entertainment to anyone (government officials or partners) in exchange for any improper favour or benefit is never permissible. Gifts of cash or cash equivalents, such as gift cards, are never permissible.

A violation of relevant anti-corruption laws can lead to severe civil and criminal penalties and reputational harm to DSIK. Employees that violate these laws can also face severe civil and criminal penalties, including jail time.

Measures to counter corruption at DSIK:

DSIK denounces and has implemented measures to counter and prevent corruption. During DSIK's onboarding process all employees undergo anti-corruption training which includes awareness raising. This includes sensitization of negative impacts of corruption on the objectives of international development cooperation and its risks on a personal level. In addition, an internal guideline offers precise instructions on how to prevent corruption at DSIK. One of its core elements is the multiple-eye principle. The participation or co-checking by several employees or organizational units is considered a standard procedure at DSIK.

DSIK has a comprehensive quality assurance management system in place to ensure compliance with national and international law, best practice, and industry standards. This system of decentralized control and oversight also enables DSIK to strengthen its efforts against corruption and malicious business practices.

1. In cooperation with partner organizations:

Measures for prevention of corruption must be agreed with partner organizations in the project agreements. Partner organizations are prohibited from making corrupt payments on DSIK's behalf. Partners are strongly encouraged to report corrupt practices to DSIK's Internal Reporting Office.

2. Reporting of a corruption case

In the event of a suspicion of a corruption offense based on facts, DSIK has set up an Internal Reporting Office where all complaints or grievances can be reported. The Internal Reporting Office allows for anonymous or confidential reports and is compliant with international data protection regulation and the EU directive on Whistleblowing.