Commonwealth Secretariat

Counter Fraud and Corruption Policy Summary

Purpose

1. The Commonwealth Secretariat has a zero-tolerance policy towards fraud and corruption. It is committed to acting professionally, fairly with integrity in all its activities and relationships. It will implement and enforce effective systems to counter fraud and corruption and to investigate any such allegations or suspicions.
2. The reputation of the Commonwealth Secretariat in operating ethically, respecting national laws and in accordance with international administrative law is of paramount importance in maintaining support from Member Countries.

Scope

3. The Commonwealth Secretariat expects implementing partners, Sponsors, Associated Organisations, suppliers and other entities which may promote the work of the Commonwealth Secretariat (together "Counterparties") to uphold the same high standards and to operate in a manner that actively prevents, detects, and encourages reporting of fraud and corruption.

Policy Statement

4. Fraud and corruption of any kind is strictly prohibited. For the purposes of this policy:

   4.1. **Fraud**: Involves an act or omission designed to deceive others with the intent of personal gain, including gain to close family members or associates, or benefit to the Commonwealth Secretariat or to avoid an obligation for oneself or others.

   4.2. **Corruption**: The misuse of entrusted power for personal gain, including gain to close family members or associates, or for the benefit of the Commonwealth Secretariat.

5. Industry practices may vary from country to country or from culture to culture and what is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidance set out in this Policy Statement is

expected of all Counterparties at all times, irrespective of where activities are being carried out.

Preventive Measures

6. Counterparties will be expected to have in place adequate procedures to prevent and detect fraud and corruption and use all reasonable endeavours to ensure that they comply with this Policy (as updated from time to time).

Reporting

7. The Commonwealth Secretariat is committed to taking appropriate action against fraud and corruption and encourages Counterparties to be vigilant and to report any unlawful conduct, suspicions or concerns promptly to the Secretariat so that an investigation may proceed and any necessary action can be taken quickly.

8. The Commonwealth Secretariat may report any incidences raised to an appropriate regulatory agency or police and/or terminate contracts with Counterparties.

Non-Compliance with the Policy

9. A breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement as applicable.