



**Center for Information and Counseling on
Reproductive Health
TANADGOMA**

44 Chavchavadze Ave. P.O. Box 241;
0179 Tbilisi, Georgia;
Tel/Fax (955 32) 2352132;
e-mail: center@tanadgoma.ge
www.tanadgoma.ge

Anti-corruption and anti-fraud policy statement

Approved by: Tanadgoma Board
Date: 06.02.2014

Tanadgoma has a no tolerance policy towards fraud and corruption. All employees and partners are required to comply with this position. This Policy applies to every Tanadgoma employee, including executive and financial directors and members of the Board and reflects the standards to which Tanadgoma expects its employees or representatives adhere when acting on Tanadgoma's behalf.

Term definitions

“Corruption” means the offering, giving, receiving or soliciting, directly or indirectly, of anything of value (money, gifts, job positions etc) to improperly influence the actions of another party or for private gain.

“Fraud” means any action intended to deceive another party in order to improperly obtain a financial or other benefit or avoid an obligation.

Policy

1. Tanadgoma does not take part in acts of corruption, or pay bribes or receive kickback either directly or indirectly.

Tanadgoma prohibits its employees from engaging in acts of corruption, and from paying bribes or kickbacks to, or accepting bribes or kickbacks from, public officials and private individuals such as the personnel of companies and organizations with which Tanadgoma has been cooperating.

Tanadgoma's employees may not offer to or accept from third parties gifts, rewards, benefits or other incentives that could affect Tanadgoma's impartiality and could influence Tanadgoma's decision or could lead to the improper performance of organizational activities.

Representative costs (as of limits defined in the Tax Code of Georgia) are not considered as bribes, gifts or other incentives from Tanadgoma.

2. Employees must avoid situations in which their personal interests could conflict with the interests of the organization. Employees must disclose any personal conflict of interest or perceived conflict to their superior or to the Board.
3. Special attention shall be given to major purchases. In case of purchases of value above 15000 GEL a formal tender process should be performed. In case of purchases of value in the interval 1500– 15000 GEL receiving two or more price bids from suppliers is required (see *Financial Procedures and Policies Manual*).
4. The executive director and financial director of Tanadgoma shall annually review the financial management and accounting procedures of the organization for checking the compliance of the organization's financial management with the anti-corruption policy. In case of joint projects, Tanadgoma requests from partner organizations to have anti-corruption and anti-fraud policy. If the partner does not practice such policy, Tanadgoma requires partners to sign agreement document about this policy.
5. Tanadgoma is politically neutral; it does not make donations to any political parties, organizations, or individuals engaged in politics. Though Tanadgoma will cooperate with governments and other official bodies in the development of appropriate policies and legislation that may affect the area of Tanadgoma's expertise.

Employees are entitled to their own political views and activities, but they must not use Tanadgoma's property or equipment to promote those views or associate their views with those of Tanadgoma.

Responsibility

If any employee receives information that an improper payment has been made, promised or authorized or that any other violation of applicable Anti-corruption and anti-fraud Policy may have occurred, the person must notify the supervisor, Executive Director or Board of the organization. The person who reveals the corruption or fraud must stay confidential.

The Executive Director of Tanadgoma is responsible for monitoring the overall compliance of the organization with the anti-corruption policy.

Board of the organization can make final decision about the fact of corruption or fraud. Board is responsible also for making changes and additions in this policy document. There is no permitted deviation or waiver from this policy.

Consequences of violation

All forms of corruption will result in immediate internal investigation and possibly suspension. Personnel found guilty in bribery, corruption or fraud will be made known to all other employees for preventive purposes and will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment.

Internal Communication

The anti-corruption and anti-fraud policy will be distributed to employees in writing when assignments are made and will be explained orally as well. The policy statement shall be published on website of the organization.

External communication

All incidences of corruption and fraud or suspected corruption shall result in a report stating the severity and scope of the issue and actions taken thereafter. All reports shall be sent to donor organization, partner organization and shall be made available on request for all interesting parties.