

Anti-Corruption Policy

1. OBJECTIVES

Corruption leads to an inefficient use of resources, impairs opportunities for development, and is a major contributing factor to the inequitable distribution of income and wealth in many countries.

CFFA campaigns for transparency and accountability in the governance of fisheries, as corruption contributes to unsustainable and inequitable fisheries management. This makes it imperative that CFFA adopts a strong approach to preventing corruption in its own work and the work of its partners.

The objective of CFFA anti-corruption policy is:

- to clarify its view on corruption,
- to describe how people contributing to CFFA activities, as staff, board member or partner shall behave to prevent being involved in corruption.

The goal is for CFFA to ensure that the donors contributions shall be used for the agreed activities and that the results shall be achieved in the most efficient manner with minimal risk for these funds contributing to corruption.

2. CFFA ANTI-CORRUPTION POLICY

The Coalition for Fair Fisheries Arrangements (CFFA) strongly rejects all forms of corruption. This means the following:

- CFFA employees, board and partners shall manage the powers, funds and material assets entrusted to them with the greatest responsibility towards the beneficiaries of the activities and the donors.
- Employees and partners shall not take advantage of their positions within CFFA to acquire any form of personal rewards or unfair rewards for another party.
- Employees and partners shall not, in connection with visits and activities organized by CFFA, accept gifts or other benefits of economic value. Small presents can be accepted, on behalf of CFFA, for cultural reasons.
- Employees and partners shall not take part in CFFA activities with the intention of gaining personal rewards. In particular, ‘sitting allowance/attendance fee’ – i.e. money paid to participants to attend a meeting – will not be paid by CFFA and its partners, as it results in situations where stakeholders, officials and experts do not attend meetings unless they receive payments.
- Employees and partners should report a suspected incident of corruption involving another employee or partner of CFFA to the CFFA Board. The CFFA Board will respect the confidentiality of anyone reporting corruption and is committed to undertake prompt further investigation.
- Any employee or partner of CFFA proven to be engaged in corrupt activities will face disciplinary action as directed by the CFFA Board, including the possibility of immediate termination of contract and legal action to recover any costs.
- CFFA is committed to promoting transparency and accountability in fisheries management and within its own organization and work, and these values are to be respected by CFFA employees and partners in their work.

Each employee, member of the board, and partner shall sign a document committing themselves to following this anti-corruption policy.¹

¹ See annex 1, page 4.

3. IMPLEMENTING CFFA ANTI-CORRUPTION POLICY

- Each employee, board member and partner is responsible for following the practices established by CFFA for preventing corruption, including guidelines for procurement, rules for budgeting, financial reporting, etc.
- CFFA administrative Board is responsible to develop, monitor, and improve CFFA internal control systems.
- For CFFA activities, budgets shall be specified both in local currencies and in euros, so that full transparency is possible in the reporting of results, and so that exchange rate gains cannot be hidden.
- Annual budget should include costs for independent certified auditing and for the services of a qualified accountant.
- Annual accounts, reports/plans of activities and audit are presented and agreed annually by CFFA administrative board, and to CFFA programming committee, composed of CFFA partners.
- The certified auditor provides an annual audit of accounts, as well as a management letter with remarks and suggestions to improve CFFA internal system. Independently from the accounts audit, a treasurer report is also made available, which assesses whether the funds have been disbursed to appropriately fulfill the objectives of CFFA.
- Property and assets control: Assets are only computer hardware which are documented in the auditor report.
- Procurement rules for good and services
 - For the procurement of goods or services above 1000 euros, the agreement of one member of the board is requested as a pre-requisite (email as documentation).
 - For the procurement of goods or services above 5000 euros, a tender has to be done, expecting three quotations, and choice is to be approved by CFFA board and partner. Once a good and reliable provider has been selected, it can be kept for the next 5 years.
 - When choosing goods and services, the ecological footprint has to be considered (minimize travel costs, environmentally friendly office goods).
 - The economically most advantageous tenderer, taking into consideration criteria such as price, quality, environmental impact, will be selected.
- To avoid the practice of ‘sitting allowance/attendance fee’, eligible costs for participants attending CFFA and CFFA partners meetings: reimbursement of visa costs, travel costs incurred to participate to the meeting, a fixed amount for meals.
- Cash payments are avoided as much as possible. Cash payments are supported by signed receipts and documentation.

ANTI-CORRUPTION POLICY FORM

The Coalition for Fair Fisheries Arrangements (CFFA) strongly rejects all forms of corruption. This is reflected in the activities of both the organisation's staff, board members and partners. This policy means the following:

- CFFA employees and partners shall manage the powers, funds and material assets entrusted to them with the greatest responsibility towards the beneficiaries of the activities and the donors.
- Employees and partners shall not, in connection with visits and activities organized by CFFA, accept gifts or other benefits of economic value. Small presents can be accepted, on behalf of CFFA, for cultural reasons.
 - Employees and partners should report a suspected incident of corruption involving another employee or partner of CFFA to the CFFA Board. The CFFA Board will treat respect the confidentiality of anyone reporting corruption and is committed to undertake prompt further investigation.
 - Any employee or partner of CFFA proven to be engaged in corrupt activities will face disciplinary action as directed by the CFFA Board, including the possibility of immediate termination of contract and legal action to recover any costs.
 - CFFA is committed to promoting transparency and accountability in fisheries management and these values are to be respected by CFFA employees and partners in their work.

The undersigned has been informed of the Anti-Corruption Policy of CFFA and promises to comply with these.

Place, DD Month YYYY

[Insert signature]

Name Surname

Title (board member/staff/partner)