Policy on Corruption, Sexual Exploitation, Abuse and Harassment (SEAH)

This policy applies to all operations of Acting for Change. Acting for Change's approach to corruption and sexual exploitation, abuse, and harassment (SEAH) is to always prevent, never accept, always report, and always act, even in situations where this may result in delays, obstacles, or complete disruption of operations.

Definition and Position

Acting for Change opposes all forms of corruption and defines corruption as an abuse of trust, power, or position to obtain improper gain for oneself or others.
Corruption may have financial or other motives and can manifest in various behaviours and irregularities for personal gain. This may include financial benefits such as offering or receiving bribes, including bribes to foreign officials, extortion, conflicts of interest, and various types of fraud, for example, document falsification, brand fraud, financial fraud, procurement fraud, and facilitation payments.
It may also involve non-financial advantages such as increased influence, improved reputation, political recognition, votes, or sexual or other services. Such benefits can be obtained in exchange for food, shelter, protection, or other resources, meaning it is not always a matter of money in exchange for personal gain. Corruption can also involve nepotism or cronyism, where someone uses their employment or position to favour relatives, friends, partners, or other close associates. Negligence or mismanagement can also constitute a form of corruption. Corruption is a form of abuse of power.

Acting for Change also takes a strong stand against all sexual exploitation, abuse, and harassment (SEAH). Acting for Change endorses the definition of SEAH as including abuse of power and vulnerability to obtain sexual services, physical or non-physical sexual acts without consent, and unwanted sexual advances that create a hostile work environment. Acting for Change works to maintain a fair and respectful working environment.

Responsibility and Application

This policy is adopted by the board of Acting for Change. Any revisions to the policy are decided by the board. The policy is monitored and evaluated annually by the Executive Director and the board. The board chair is responsible for ensuring that all board members are aware of, understand, and apply the anti-corruption policy. The Executive Director must ensure that all employees, interns, consultants, volunteers, and other individuals engaged by Acting for Change are aware of, understand, and apply the policy. The Executive Director is responsible for keeping the policy document updated and ensuring that it is applied within the

organization. The work should lead to continuous learning through the application of the policy.

Preventive Measures

To prevent corruption and SEAH, we promote an organizational culture that encourages discussion of ethical dilemmas, the benefits of reporting, and thorough risk assessments, as we believe this improves the organization as a whole. Our guiding principles for preventive work are transparency, accountability, integrity, and courage. Acting for Change works on core values and maintains an open and ongoing discussion on gender equality both internally and externally.

Acting for Change has internal procedures documenting the link between responsibilities and authorities in the delegation framework to ensure accountability. The organization evaluates its partners and conducts joint risk assessments of all project or program applications to prevent corruption and reinforce ethical standards, equality, and open discussion. This is done before, during, and throughout changes in collaborative projects. For new projects, we always discuss with partners the importance of preventing corruption and promoting gender equality, as well as the possibilities to report issues to us. We assess partners' capacity to manage funding satisfactorily before entering into collaboration.
Acting for Change has financial and accounting procedures and systems that ensure no single person controls finances alone. We maintain an open budgeting process with our partners, regularly monitored to detect deviations. Auditors review project finances, and financial reports must align with narrative reports. Spot checks may be conducted by us or our partners under funders' supervision.
All procurements, including those conducted by partner organizations and subsequent partners, take this policy into account.

Information and Whistleblowing

At Acting for Change, we believe in transparency and integrity. We want to create an environment where everyone feels safe to speak up if something is wrong. It is crucial to inform us if anything is discovered within our organization or among our partners. Information about corruption or SEAH can ideally be reported internally to the immediate supervisor or the board chair, depending on the circumstances. Reporting internally allows for prompt action.

If the whistleblower believes the information is not suitable for internal reporting, they can submit anonymous information via our online system. Individuals reporting suspected corruption or misconduct under this policy will receive confirmation that Acting for Change has received the information, provided contact details are shared, and prompt follow-up will be made. All information is treated with the utmost discretion, accessible only to a limited group of trusted individuals. Data is handled carefully and never shared outside the dedicated investigation team without the whistleblower's explicit consent.

Acting for Change will never subject whistleblowers to negative consequences for sharing information in good faith. Reporting suspicions of corruption and acting as a protected whistleblower are regulated under EU and Swedish law. A whistleblower expressing a genuine concern under this policy will not risk losing their job or facing sanctions or personal

disadvantages as a result of their report. It does not matter if the suspicion proves incorrect, provided the whistleblower acted in good faith. Whistleblowers have the right to report anonymously in a manner they deem appropriate and possible.

Investigation and Measures

When information regarding suspected corruption or SEAH reaches Acting for Change, it must be assessed immediately to decide whether an investigation should be initiated and which measures are necessary to minimize potential harm. Whether an investigation is launched depends on whether the suspicion involves serious misconduct such as rule violations, corruption, fraud, abuse of power, sexual exploitation, abuse, or harassment.
The recipient of such information must immediately report it to the Executive Director. If the Executive Director is implicated, responsibility shifts to the board chair. If the chair is implicated, it shifts to a suitable board member. If the entire board is implicated, responsibility returns to the Executive Director.

When an investigation is initiated, an investigation team is appointed with one person responsible for documenting the process. Documentation must include all internal and external correspondence and be archived. Documents containing sensitive information about employees or partners must be archived as confidential information.
In cases of suspected criminal activity, the matter must be reported to the police. For suspected criminal activity involving an international partner, Acting for Change will assess in dialogue with the organization whether to report, taking into account any risks to the partner. Funding may be revoked, stopped, or frozen.
If the matter concerns finances, corrections in accounting, budget adjustments, and measures to prevent recurrence may be necessary. For other types of issues, restrictions, disciplinary measures, new procedures may be applied.
In cases of sexual exploitation, abuse, or harassment, it is of utmost importance that investigations and measures focus on supporting the victim and evaluating what went wrong and how it can be corrected.

Acting 4 Change, Board of Directors

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