

TNI Integrity Policy

I. **Goal:**

TNI is able to recognise integrity issues, to take precautions, to identify and investigate signals, and to respond to inappropriate behaviour. Inappropriate behaviour may damage internal harmony, our reputation and may have legal and/or financial consequences.

II. **Aspects:**

- A. Corruption and Fraud: prevent theft or other behaviour aimed at securing unauthorised and/or inappropriate profit or advantage
- B. Liability: prevent legal claims against TNI
- C. Conflict of interests: prevent decisions that (may seem to) involve a conflict of interests
- D. Misbehaviour: prevent behaviour (inside or outside TNI) that can damage TNI's (internal and external) relations and reputation.

A. Risk of Corruption and Fraud

1. **Definitions:**

Fraud: to mislead or cheat in order to secure inappropriate profit or advantage, including outright theft

Corruption: to ask for or to offer bribes to secure inappropriate profit or advantage

Possible actors are both internal (TNI staff, including Director and Board members) as well as external (partners, suppliers or other contracted third parties).

2. **Duties and Responsibilities:**

- a. All TNI staff including contracted personnel have a duty to:
 - Uphold TNI's reputation
 - Ensure TNI's properties are not damaged, lost or stolen
 - Comply with TNI policy in relation to invoicing and payments, including reimbursements
 - Be aware of the risks of fraud and corruption
 - Report signals of possible fraud or corruption to the Director or to a member of the Management Team (MT)
 - Identify situations that can facilitate fraud or corruption and to communicate these to the Director or to a member of the MT or Board
 - Discuss openly dilemmas that can lead to (accusations of) fraud or corruption
 - Be helpful with inquiries
- b. All Programme Leaders additionally have a duty to:
 - Respond to signals of possible fraud or corruption
 - Take precautions to prevent fraud or corruption
 - Inform new employees of TNI's integrity policy
 - Increase awareness amongst TNI staff of the risks of fraud or corruption
 - Be open to discussing situations that can lead to fraud or corruption
 - Support staff that report fraud or corruption as best they can
- c. The Finance Manager additionally is responsible for:
 - Ensuring strict adherence with TNI policy in relation to invoicing and payments, including reimbursements
 - Advising the Director and the Supervisory Board on measures necessary to prevent fraud or corruption
- d. The Executive Director additionally is responsible for:
 - Monitoring adherence with TNI policy in relation to invoicing and payments, including reimbursements

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- Coordinating and/or executing investigations into reported cases of possible fraud or corruption
 - Reporting any such cases to the Supervisory Board
- e. The TNI Supervisory Board additionally is responsible for:
- Declaring any potential conflicts of interest at each meeting of the Supervisory Board
 - Adopting policies in relation to the prevention of fraud and corruption
 - Assessing the effectiveness of existing policies and procedures in relation to fraud and corruption
 - Taking action where a case of fraud or corruption involves or implicates the Executive Director

3. *Inventory of risks:*

- a. Theft:
- Theft from the petty cash box
 - Theft of TNI property
 - Use of the TNI credit card for personal purposes
 - Use of TNI funds for personal purposes
- b. Fraud:
- Forging the signature of authorised or other personnel
 - Fraudulent bank transfers for personal gain
 - Double-claiming for reimbursement, including from third parties
 - Claiming for non-existent expenditure, including per diems for days not travelled
 - Claiming for personal expenses
 - Manipulating currency exchange rates for personal advantage
 - Falsifying time sheets
- c. Abuse of TNI resources:
- Using TNI property privately without authorisation
 - Lending out TNI property to third parties without authorisation
 - Damaging or losing TNI property through negligent behaviour
 - Incurring unnecessary and/or unauthorised costs for TNI – for example, travelling business class at TNI expense
- d. Salary-related risks:
- Unauthorised salary increase and/or increased secondary benefits eg. pension contributions
 - Falsified timesheets to justify additional time off or increased reimbursement
 - Falsified claims of sickness to justify paid time off
 - Using TNI time to deal with personal affairs
- e. Corruption:
- Promoting one's own associates, friends or family members for TNI contracts in the hope of profiting personally, whether financially or otherwise
 - Asking for or accepting money or any other privileges in return for arranging grants or contracts or any other favour from TNI
 - Offering or giving money or any other privileges in exchange for outcomes that favour TNI or oneself personally
 - Accepting gifts of significant value and not declaring these to TNI

4. *Precautions*

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- Creating an atmosphere of trust and integrity. TNI tries to achieve this by allowing people to make mistakes (when made unintentionally) and by being open to discussing dilemmas and possible temptations without fear of unreasonable sanctions.
- Creating objective procedures for selecting partners, personnel, freelancers and suppliers.
- Creating clear procedures for spending money and claiming reimbursements.
- Creating clear procedures for registering absences from the office, rights to paid time off
- Separating functions for registering invoices, authorising payments, registering payments and bookkeeping
- Having an external auditor to check the bookkeeping and financial procedures
- Limiting the petty cash to 250 euro
- Balancing the petty cash monthly
- Locking the petty cash box
- Storing the locked petty cash box in a locked place
- Locking away valuable properties
- Adhering to a system of signing out valuable equipment
- Restricting access to keys to locked places to authorised personnel
- Not having digital copies of authorised signatures generally accessible
- Restricting credit card and banking codes to authorised personnel

B. Risk of Liability

TNI is aware of the risks that in defending the interests of certain groups, others can perceive this as damaging their interests. We do not want to damage the reputation of individuals, organisations or companies intentionally. We strive to stay within the law in everything we do, are careful to seek legal advice where this is deemed prudent -- particularly in relation to libel – and seek the highest standards in producing reliable research results and publications.

TNI is aware of the risks that poor labour practices entail legally. We strive to maintain the highest standards of fairness as employers and respect the labour laws of The Netherlands.

C. Conflict of interest risks

1. *Definition:*

A conflict of interest refers to a situation where a member's primary interest (TNI) could be influenced by secondary interests to the detriment of the primary interest.

2. *Inventory of risks:*

- Where a TNI staff member has a personal relationship with an individual, company or other party contracted by TNI and is in a position to influence the awarding of such contract
- Where a TNI staff member also holds an influential position in another organisation with the power to (co-) decide about grants for TNI or partners
- Where a TNI staff or Board member also holds a position within an organisation with which TNI has an antagonistic relationship
- Where a member of one of TNI's decision-making organs (eg. Board or MT) is also a funder of TNI
- Where a member of one of TNI's decision-making organs (eg. Board or MT) is also an evaluator of TNI

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3. *Precautions*

Any TNI staff or Board member who thinks they may have a conflict of interests in relation to a particular decision has a duty to declare that conflict of interests and should recuse him/herself from the process of making that decision. This would apply both within TNI and within the other organisation concerned.

D. **Risk of Misbehaviour**

1. **Definition:**

Misbehaviour is behaviour, both during working hours as well as out of working hours, that is inappropriate and can damage the image or credibility of TNI. Misbehaviour can also result in reduced trust among colleagues.

2. **Inventory of risks:**

- Intimidation
- Sexual harassment
- Aggression
- Bullying
- Gossip
- Discrimination
- Exclusion
- Abuse of information
- Abuse of power
- Disorderly behaviour as a result of substance abuse

3. **Precautions**

- Being clear at the point of employment about the values of the organisation
- Creating a culture of fairness, inclusion and mutual respect within the organisation
- Creating an atmosphere of openness and transparency such that staff and other representatives of the organisation can be held accountable for misbehaviour in ways conducive to correction
- Instituting clear and fair disciplinary procedures with a view to correcting misbehaviour where this is of a serious enough nature to warrant such procedures
- Offering aggrieved parties the option of meeting with an appointed Trust Person
- Offering aggrieved parties the option of filing a formal grievance

III. **Procedure for reporting:**

1. **Types**

We discern three types:

- Report a risk: there is no specific person involved. It is theoretical, and based on an analysis of conditions
- Report a signal: a specific person is involved but there is no proof.
- Report a complaint: a specific person is involved and there is proof.

2. **Procedure:**

- Everyone may report possible integrity failure: TNI staff as well as third parties.
- The principle of subsidiarity applies – what can be resolved at the lowest level should be resolved at that level.
- In the first instance, it is advised that the complainant first addresses directly the person involved regarding the matter. If this does not resolve the matter, then the complainant should

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take the complaint to the immediate line manager. Where this is the person concerned, then it should go to their line manager or in the case of the Executive Director, to the Chairperson of the Board.

- The process will be kept as confidential as possible in the interests of resolution, and in defence of the integrity and reputation of the individuals concerned. This may prove difficult, however, should a case result in litigation.
- TNI undertakes to protect the complainant from reprisals by the accused.
- If the complainant is unwilling or unable to put the complaint in writing, the person to whom the complaint is reported will do so. A copy of the complaint must be given to the Administrative Manager (being the Personnel Manager), who then files it securely. The reports should include:
 - ✓ Type of report
 - ✓ Details: location, project, date, person(s) involved, situation
 - ✓ How the complainant is involved
 - ✓ Who else know about this?
 - ✓ Is the situation still continuing or has it stopped?
 - ✓ Documents or other evidence to support the report

3. Follow up:

Following a complaint being registered, the complaint will be investigated. The Director decides who will execute this investigation, unless the Director is involved in the complaint, in which case it is the Board which decides.

The investigation may be done by a TNI staff member or by an external person or committee. The investigator(s) advises as to how to deal with the results of the investigation. It is the Director (or the Chairperson of the Board) who decides about follow-up on the results.

Options may include:

- Doing nothing where the complaint does not warrant further action or cannot be proven
- Instituting a formal disciplinary action
- Issuing a formal oral or written warning
- Suspending the person concerned with or without pay depending on the circumstances and pending a final decision
- Moving the person concerned to another position within TNI
- Dismissing the person concerned
- Reporting the matter to the police
- Taking the matter to court

Follow-up will also involve evaluation of the conditions that led to the complaint and the precautions necessary to prevent similar circumstances arising in the future.

All documentation will be filed securely by the Administrative Manager.

Revision of the 4 November 2009 policy on advice of Supervisory Board meeting of 27 November 2015.