

RÉSEAU DES FEMMES LEADERS POUR LE DÉVELOPPEMENT

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Anti-Corruption & Conflict of Interest Policy

Zero-tolerance integrity framework governing all persons acting on behalf of RFLD

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1. Purpose, Background, and Mandate

1.1 Purpose of This Policy

This Anti-Corruption and Conflict of Interest Policy ('the Policy') establishes RFLD's comprehensive and legally grounded framework for preventing, detecting, managing, and responding to corruption, bribery, fraud, and conflicts of interest across all organisational activities and in all countries of operation. It reflects RFLD's unconditional commitment to integrity as the foundation of its feminist mandate, its credibility as a continental civil society actor, and its accountability to the donors, communities, and women's rights defenders it serves.

Corruption and undisclosed conflicts of interest do not merely represent legal or financial risk — they divert resources from women's rights defenders and activists, undermine the independence of RFLD's advocacy, erode trust with donors and partners, and betray the communities most harmed by impunity. This Policy therefore occupies a position of the highest institutional priority, applying with equal force to the Executive Director and a field volunteer, to a Board member and a delivery partner.

1.2 Background and Organisational Context

RFLD — Réseau des Femmes Leaders pour le Développement — was founded in 2013 and has grown into a pan-African feminist intermediary with four offices (Cotonou, Accra, Dakar, Banjul), 670 member organisations, and active programme delivery in 15+ countries. In 2025, RFLD managed USD 1,768,026, with 85% channelled directly to field activities. Under the NAFASI programme (2026–2029), funded by Sida in consortium with Magamba Network and DefendDefenders, RFLD's scale and institutional exposure increase significantly.

This scale-up increases both the volume of funds RFLD stewards and the complexity of its integrity risks. More offices, more partners, more countries, and more donor relationships each introduce new vectors for corruption, conflict of interest, and misuse of resources. RFLD must therefore maintain integrity systems that are not only principled but operational — practical to implement in Cotonou, Accra, Dakar, and Banjul, as well as in field locations across Mali, Burkina Faso, Niger, and beyond.

In 2025, KPMG conducted an Efficiency Audit of RFLD that identified specific gaps in RFLD's integrity infrastructure, in particular: the absence of a clearly specified confidential hotline number accessible across all offices; and the fragmentation of integrity reporting channels across multiple policy documents, creating confusion about how and where to report concerns. This Policy directly remedies those findings. It consolidates all integrity mechanisms — definitions, prohibitions, reporting channels with full contact details, investigation procedures, sanctions, and whistleblower protections — into one authoritative document.

1.3 RFLD's Integrity Mandate — Sources of Obligation

RFLD's integrity obligations arise from multiple independent and reinforcing sources:

- RFLD's own values as a feminist organisation — RFLD exists to challenge unjust power, not replicate it. Corruption and patronage are antithetical to this mandate.
- Sida (Sweden) — RFLD's lead institutional donor for NAFASI requires compliance with Sida's Anti-Corruption Policy and the conditions of the NAFASI Grant Agreement, including mandatory reporting of integrity incidents.
- GIZ/BMZ (Germany) — RFLD's obligations under the SEA-T cohort require adherence to GIZ/BMZ Anti-Corruption Compliance Standards.
- NGOsource 501(c)(3) Equivalent — US public charity standards require appropriate governance and financial controls as conditions of the equivalency determination.
- ACHPR Observer Status — RFLD's standing with the African Commission on Human and Peoples' Rights carries reputational obligations requiring institutional integrity consistent with the Commission's standards.
- National law in Benin, Ghana, Senegal, and The Gambia — each jurisdiction's criminal law on corruption, bribery, and fraud applies to RFLD's operations in that country.
- UN Convention Against Corruption (UNCAC) and the African Union Convention on Preventing and Combating Corruption (AUCPCC) — international frameworks which inform the standards in this Policy.

ZERO

RFLD applies an absolute zero-tolerance position on: bribery of public officials; sexual

TOLERANCE

exploitation linked to aid delivery; misappropriation of donor funds; and deliberate falsification of financial or programme records. These offences will result in immediate suspension pending investigation, mandatory Board notification, notification to relevant donors, and referral to law enforcement where the evidence supports. There are no exceptions based on seniority, length of service, cultural context, or operational urgency.

1.4 Relationship to Other RFLD Policies

This Policy operates alongside and cross-references the following RFLD policy documents. In the event of conflict between this Policy and another RFLD document, the more stringent provision applies:

Related Policy	How It Connects to This Policy
RFLD Financial Management Policy (RFLD-POL-FIN-v1.0)	Embeds financial controls (segregation of duties, dual authorisation, three-way match) that are the primary day-to-day mechanism for preventing fraud and misappropriation.
RFLD Procurement Policy (RFLD-POL-PROC-v1.0)	Governs procurement integrity — vendor due diligence, competitive tendering, evaluation independence, and supplier anti-corruption obligations.
RFLD Safeguarding & PSEAH Policy (RFLD-POL-SFG-v1.0)	Provides specific provisions on sexual exploitation linked to aid delivery — the intersection of this Policy's zero-tolerance provisions and safeguarding obligations.
RFLD HR Policy (RFLD-POL-HR-v1.0)	Governs disciplinary procedures and employment protections that give effect to sanctions under this Policy, consistent with national employment law.
RFLD Sub-Granting & Partner Management Policy (RFLD-POL-SGP-v1.0)	Governs integrity obligations of implementing partners and sub-grantees handling RFLD funds.
RFLD Data Protection Policy (RFLD-POL-DPP-v1.0)	Governs confidentiality of personal data arising in integrity investigations and reporting processes.

2. Scope of Application

2.1 Personal Scope — Who This Policy Covers

This Policy applies in full to all of the following persons ('Covered Persons'). Coverage is not contingent on the person being paid by RFLD, being physically in an RFLD office, or being a national of an RFLD country of operation:

- All permanent, fixed-term, part-time, and probationary employees of RFLD in all offices and locations.
- All Board members and members of any Board committee, including the Finance Committee and Audit Committee.
- All members of the Ethics Committee.
- All consultants, advisers, and independent contractors engaged by RFLD, regardless of the duration or nature of the engagement.
- All volunteers, interns, and fellows working under RFLD's name or with RFLD resources.
- All implementing partners, sub-grantees, and member organisations of RFLD's WAFF Fund and other re-granting mechanisms — to the extent set out in their sub-grant or partnership agreements.
- All suppliers, service providers, and vendors under contract with RFLD — to the extent set out in their contracts and in the Supplier Code of Conduct they sign.
- Any individual or organisation acting as an agent, representative, intermediary, or adviser on RFLD's behalf in any country.

2.2 Geographical Scope — Where This Policy Applies

This Policy applies to all activities and conduct wherever they occur: at RFLD offices (Cotonou HQ, Accra, Dakar, Banjul); at field programme locations across any of RFLD's 15+ countries of active programme delivery; at third-party venues (conferences, partner offices, government buildings, events, donor meetings); online and in remote-working contexts; and in any personal capacity where the conduct could reasonably affect RFLD's reputation, resources, or legal standing.

The Policy applies regardless of local cultural norms or practices. RFLD acknowledges that gift-giving, facilitation of introductions, and relationship-building take different forms across its operating environments. This Policy provides clear guidance on what is acceptable and what is not within RFLD's integrity framework, without dismissing the cultural intelligence needed to navigate those environments.

2.3 Activity Scope — What This Policy Covers

The Policy covers all aspects of RFLD's work including: programme design and delivery; procurement and contracting; grant-making and sub-granting; financial management and reporting; human resources and recruitment; external communications and advocacy; partnerships and donor relations; and any other activity undertaken using RFLD resources or in RFLD's name.

3. Foundational Principles

This Policy is grounded in seven non-negotiable principles. These principles are not aspirational values — they are operational standards applied in every integrity decision and every investigation outcome:

Principle	What It Requires in Practice
Integrity	Every decision and action — whether financial, programmatic, or relational — must be taken with honesty and in the genuine interests of RFLD's mission, never for personal gain. Integrity applies equally in public and in private and does not vary with context, culture, or seniority.
Transparency	All financial transactions, procurement decisions, hiring decisions, and grant awards must be documented, justifiable, and available for audit. Verbal agreements on matters of consequence are insufficient. Every significant decision has a paper trail.
Accountability	Every Covered Person is individually and non-delegably accountable for their own compliance with this Policy. Accountability cannot be delegated upward ('management will handle it') or downward ('I was following instructions from above'). The obligation to refuse prohibited conduct and to report known violations is personal and absolute.
Independence	RFLD's positions, recommendations, and programme decisions must be free from undue influence by any external party — including donors, governments, suppliers, and partners. No financial or personal relationship may compromise the independence of RFLD's advocacy or analytical work.
Proportionality	Responses to violations are calibrated to the severity, intent, context, and actual impact of the conduct. RFLD applies sanctions fairly and consistently — neither too leniently (which erodes deterrence) nor disproportionately harshly (which undermines fairness).
Non-Retaliation	Good-faith reporting of concerns is actively encouraged and protected. RFLD creates conditions in which every person feels safe to speak up — including through anonymous channels — without any fear of adverse personal, professional, or safety consequences. Retaliation is itself a serious disciplinary offence.
Continuous Improvement	Integrity governance is not static. RFLD reviews this Policy annually, learns from cases (through anonymised reporting), updates its systems to address emerging risks, and benchmarks against international best practice relevant to civil society organisations operating in fragile and complex environments.

4. Key Definitions

The following definitions govern the interpretation and application of this Policy. Where a term is not defined here, its meaning under the UN Convention Against Corruption (UNCAC) or the African Union Convention on Preventing and Combating Corruption (AUCPCC) applies.

Term	Definition
Corruption	The abuse of entrusted power for private gain — encompassing bribery, fraud, embezzlement, extortion, favouritism, nepotism, collusion, patronage, and any conduct that exploits a position of trust for personal advantage at the expense of the organisation, its beneficiaries, or the public interest.
Bribery	The offering, promising, giving, accepting, or soliciting of any undue advantage — financial or non-financial — as an inducement or reward for a person to act improperly in the performance of their function or duties. The advantage need not actually be received; the offer or promise is sufficient. Both the giver and the recipient commit bribery.
Active Bribery	Offering or giving a bribe to another person.
Passive Bribery	Requesting, agreeing to receive, or accepting a bribe from another person.
Facilitation Payment	An unofficial payment made to a public official to secure or speed up a routine government service to which RFLD is legally entitled — such as customs clearance, permit issuance, or visa processing. All facilitation payments are prohibited under this Policy regardless of amount or local practice.
Fraud	Any intentional act or omission designed to deceive — including falsification or alteration of financial records; misrepresentation to obtain funds, benefits, or authorisations; submission of false invoices or receipts; identity fraud; grant fraud; and collusion with external parties to circumvent controls.
Embezzlement	The theft or misappropriation of RFLD funds, assets, or resources that have been entrusted to a Covered Person by virtue of their role.
Conflict of Interest	A situation — real, potential, or perceived — where a Covered Person's personal, financial, professional, political, or family interest could improperly influence, or could reasonably appear to influence, their decisions, actions, or advice on behalf of RFLD.
Real Conflict	A conflict that actually exists and is currently affecting or could immediately affect decision-making.
Potential Conflict	A conflict that does not yet affect decision-making but may do so in the future based on a current personal interest or relationship.
Perceived Conflict	A situation that a reasonable external observer would interpret as a conflict, even where the individual believes they can act impartially. Perceived conflicts must be managed with the same seriousness as real conflicts.
Whistleblower	Any person — staff, partner, supplier, beneficiary, or member of the public — who in good faith reports an actual, suspected, or anticipated violation of this Policy through any recognised channel.
Good Faith	A report made with a genuine, honest belief that the information is true and relevant — even if the report turns out to be mistaken. A report is not in good faith if the reporter knows it to be false or makes it primarily to harm the subject of the report.
Retaliation	Any adverse action taken against a person because they reported a concern in good faith, provided evidence in an investigation, or refused to participate in prohibited conduct. Retaliation includes dismissal, demotion, exclusion, harassment, threats, negative performance assessment, or any other form of mistreatment linked to the report.
Ethics Committee	The internal RFLD body responsible for receiving integrity reports, overseeing investigations, recommending sanctions, and reporting to the Board. Composition and mandate detailed in Section 14.
Covered Person	Any individual or organisation within the personal scope of this Policy as defined in Section 2.1.

5. Prohibited Conduct — Detailed Provisions

5.1 Bribery of Public Officials

RFLD operates in environments where demands for unofficial payments to government officials are sometimes normalised as 'the cost of doing business.' This normalisation does not create an exception under this Policy. The following conduct is strictly and absolutely prohibited:

- Offering, promising, giving, or authorising any payment — in cash, kind, or any other form — to a public official for the purpose of obtaining, retaining, or facilitating any business advantage, permit, licence, contract, favourable decision, or other official action.
- Requesting, agreeing to receive, or accepting any payment or advantage from any party in exchange for any RFLD decision, recommendation, or official action.
- Using a third party — agent, fixer, consultant, intermediary, or local partner — to make payments to public officials that RFLD itself could not make directly.
- Structuring transactions in a way designed to conceal the nature or destination of payments to officials.
- Making any facilitation payment of any amount to any public official for any purpose.
- Tolerating a known or suspected bribery situation without reporting it promptly.

Where a public official demands a facilitation payment as a condition of performing a routine official duty, the Covered Person must: decline; document the demand in writing immediately; and report it to the Finance Manager and Ethics Committee within 24 hours using the Facilitation Payment Incident Report (Annex IV). RFLD will provide legal, operational, and if necessary, security support. Where refusal creates an immediate physical safety risk to the Covered Person, their personal safety takes priority — but the incident must be reported as soon as safety is assured.

5.2 Bribery in the Private Sector

Bribery between private parties — including between RFLD and its suppliers, implementing partners, donors, or other civil society organisations — is equally prohibited under this Policy and under the laws of RFLD's countries of operation. Specifically:

- No Covered Person may offer or receive any inducement in connection with any business decision, procurement, grant award, partnership agreement, employment decision, or any other RFLD transaction.
- No Covered Person may solicit personal benefits of any kind from any party seeking to do business with, receive funds from, or partner with RFLD.
- No supplier or partner may be selected, preferred, retained, or favoured based on any personal benefit provided to a Covered Person.
- No Covered Person may use the promise or threat of an RFLD benefit or sanction to extract personal advantage from any party.

5.3 Fraud and Financial Misconduct

The following forms of financial misconduct are prohibited. Confirmed violations in this category will be treated as grounds for summary dismissal and mandatory referral to law enforcement:

- Falsifying, altering, or backdating financial records, expense claims, timesheets, activity reports, attendance registers, participant lists, or any other supporting documentation.
- Submitting invoices, receipts, quotations, or financial reports that are false, inflated, duplicate, or not supported by actual transactions.
- Using RFLD funds for personal purposes — including personal travel, personal purchases, or payments to family members or associates without legitimate programme justification.
- Creating fictitious beneficiaries, participants, suppliers, or transactions in programme or financial records.
- Colluding with suppliers, partners, or beneficiaries to manipulate procurement, grant, or programme processes for personal financial gain.
- Deliberately misrepresenting RFLD's activities, results, financial position, or compliance status to donors, the Board, auditors, or any regulatory authority.

- Opening, using, or operating any bank account in connection with RFLD activities without Board Finance Committee approval.
- Diverting donor funds away from their intended purpose without prior written donor approval.
- Circumventing financial controls — including splitting transactions to avoid authorisation thresholds — regardless of how minor the individual transaction appears.

5.4 Misuse of RFLD Position and Resources

Covered Persons must not use their RFLD position, access, relationships, information, or resources for personal benefit or for the benefit of any person or entity other than RFLD and its beneficiaries. This prohibition includes:

- Using RFLD's name, institutional credibility, network, or platform to secure personal business contracts, consultancies, speaking fees, or other personal opportunities.
- Using confidential RFLD information — programme data, partner information, financial data, strategic plans, donor relationships — for personal advantage or to benefit a third party.
- Using RFLD equipment, vehicles, IT systems, premises, or supplies for personal use without prior written authorisation from the line manager.
- Establishing external organisations or undertakings that exploit RFLD's proprietary relationships, data, programme methodologies, or intellectual property.
- Retaining personal ownership of assets acquired with RFLD funds.
- Taking personal credit for RFLD programme results in ways that damage RFLD's fundraising or reputation.

5.5 Nepotism, Patronage, and Favouritism

RFLD's decisions on recruitment, promotion, contracting, grant-making, and programme selection must be based solely on merit, qualifications, capacity, and organisational need — not on personal relationships, family connections, ethnic, regional, political, or community loyalties. Nepotism and patronage are incompatible with RFLD's feminist values and its accountability to donors and beneficiaries:

- Recommending a family member, romantic partner, or close personal friend for employment, promotion, or contract without prior full disclosure and independent decision-making.
- Selecting a supplier, partner, or sub-grantee because of personal relationship rather than merit and due diligence.
- Awarding programme benefits or sub-grants to organisations in which a Covered Person has an undisclosed interest.
- Using RFLD's political, institutional, or donor relationships to benefit family members, personal associates, or affiliated organisations.
- Structuring programme activities to benefit a community, organisation, or cause that a Covered Person has a personal stake in, without disclosure.

5.6 Money Laundering

RFLD must not knowingly receive, use, or facilitate the movement of funds derived from illegal activity — including funds from organised crime, terrorist financing, human trafficking, corruption proceeds, or tax evasion. All significant donations and institutional grants must be subject to appropriate due diligence before acceptance. The Finance Manager is responsible for implementing donor and partner screening procedures consistent with RFLD's Financial Management Policy and applicable anti-money-laundering regulations in each country of operation.

5.7 Obstruction of Justice and Investigation

The following conduct in connection with any integrity investigation is itself a serious offence under this Policy:

- Destroying, concealing, altering, or removing evidence relevant to an integrity investigation.
- Coaching or pressuring witnesses to change their accounts.
- Disclosing the identity of a reporter without their consent.
- Making threats or applying pressure to dissuade any person from reporting or cooperating with an investigation.

- Deliberately providing false or misleading information to an investigator or the Ethics Committee.

5.8 Aiding and Abetting

Any Covered Person who knowingly assists, facilitates, conceals, or fails to prevent the prohibited conduct of another person — whether or not they personally benefit — is equally culpable under this Policy and subject to the same range of sanctions as the primary actor. Passive complicity — knowing about a violation and doing nothing — is not a defence.

6. Gifts, Hospitality, and Benefits

6.1 Rationale and Approach

Gift-giving and hospitality are embedded in the professional and social cultures of many of RFLD's operating environments. RFLD acknowledges this reality and does not seek to eliminate all professional courtesies. However, gifts and hospitality can create real or perceived obligations, compromise impartiality, and — if undisclosed or above acceptable limits — constitute bribery. RFLD therefore applies a clear, transparent, and consistently enforced framework: modest, culturally appropriate courtesies are acceptable and may be received or given within defined limits; anything that could influence or appear to influence a decision is not acceptable.

6.2 Receiving Gifts — Permitted Limits and Required Actions

Category	Permitted Limit	Registration Required	Action if Above Limit
Token promotional items (pens, branded merchandise, publications)	Up to USD 15	Not required	Return to sender or surrender to RFLD
Food or beverage consumed at a business meeting	Up to USD 30	Not required	Decline; report to line manager
Meals at business events, conferences, or partner meetings	Up to USD 60 per occasion	Log if above USD 30	Decline politely; explain RFLD policy
Cultural or ceremonial gifts in programme communities	Up to USD 30	Log in Gifts Register	Surrender to RFLD; record in register
Event tickets (cultural, sporting, entertainment)	Must be assessed case-by-case	Log all instances	Prior approval from Finance Manager required
Books, reports, or research materials	Up to USD 50	Log if above USD 20	Treated as RFLD property; register as asset
Cash gifts of any amount	NEVER PERMITTED	Report required	Refuse and report to Ethics Committee within 24 hours
Any gift during active procurement from a bidder	NEVER PERMITTED	Report required	Refuse and report immediately — may constitute bribery
Any gift creating a real or perceived obligation	NEVER PERMITTED	Report required	Refuse and report to Ethics Committee
Any single gift above USD 60	NOT PERMITTED	N/A	Decline; if culturally impossible, surrender to RFLD and report

6.3 Giving Gifts on Behalf of RFLD

RFLD may give modest gifts as part of legitimate programme activities — for example, community appreciation events, recognition of partner contributions at formal events, or culturally appropriate exchanges. All gifts given on behalf of RFLD must satisfy every one of the following conditions:

1. Pre-approved in writing by the Finance Manager.
2. Recorded in the Gifts Register with date, recipient, and value.
3. Paid from an approved RFLD budget line — not from personal funds.
4. Modest in value — not exceeding USD 30 per recipient in standard programme contexts.
5. Appropriate to the relationship, context, and occasion.
6. Never cash gifts; never given to government officials in any context that could constitute bribery; never given to procurement decision-makers during an active procurement process.

6.4 Annual Cumulative Limits

In addition to per-occasion limits, the cumulative value of gifts and hospitality received from any single source (person or organisation) in any rolling 12-month period must not exceed USD 100. The Finance Manager tracks cumulative values in the Gifts and Hospitality Register (Annex II). When a Covered Person approaches the cumulative threshold, they must notify their line manager and the Finance Manager immediately. The Finance Manager assesses whether continued acceptance of anything from that source is appropriate.

6.5 The Gifts and Hospitality Register

The Finance Manager maintains the RFLD Gifts and Hospitality Register (template at Annex II). Every item above USD 20 received or given must be logged within five (5) business days. The register records: date; Covered Person's name and role; description of item or hospitality; estimated USD value; source or recipient; relationship of source/recipient to RFLD; and whether prior approval was obtained. The register is reviewed quarterly by the Finance Manager and the Ethics Committee, and a summary is included in the Annual Ethics Report.

6.6 Facilitation Payment Protocol

When a public official demands a facilitation payment, the Covered Person must follow the RFLD Facilitation Payment Protocol:

Step	Action	Detail
1	Decline politely	State that RFLD policy prohibits such payments. Do not argue, escalate verbally, or create confrontation. Keep the interaction calm.
2	Document immediately	Note: date; time; location; name or title of official; agency or department; amount demanded; nature of service; and any witnesses present.
3	Report within 24 hours	Report to line manager and Finance Manager. Complete the Facilitation Payment Incident Report (Annex IV).
4	Report to Ethics Committee	Submit Annex IV to the Ethics Committee at integrity@rflgd.org .
5	RFLD provides support	RFLD will engage legal counsel, contact the relevant authority, and support the resolution without payment. Staff will not be penalised for operational delays caused by refusal.
6	Safety override	Where refusal creates an immediate physical safety risk (e.g., detention, physical threat), the staff member's safety takes absolute priority. Pay if necessary for safety. Report as soon as safe.

7. Conflict of Interest — Full Framework

7.1 Why Conflicts of Interest Require Proactive Management

A conflict of interest does not, by itself, mean that anyone has done anything wrong. It exists whenever a personal interest could reasonably affect — or appear to affect — an RFLD decision. RFLD's response to conflicts of interest is therefore disclosure and managed recusal, not automatic accusation. The obligation to disclose rests on the individual. The failure to disclose — whether out of embarrassment, inconvenience, or deliberate concealment — is what transforms a manageable potential conflict into a disciplinary matter.

RFLD operates in environments where personal, family, ethnic, and community networks are often central to how organisations and civil society engage. This policy does not require Covered Persons to be socially isolated — it requires them to be transparent about relationships that could affect their impartiality in specific RFLD decisions and to recuse themselves when relevant.

7.2 Categories of Conflict of Interest

7.2.1 Financial and Commercial Interests

- Holding shares, partnership interests, directorships, or other ownership stakes in any organisation that does or seeks to do business with RFLD.
- Receiving personal income, consultancy fees, honoraria, or any financial benefit from an RFLD supplier, partner, competitor, or donor — other than through RFLD employment.
- Being a beneficiary of a trust, endowment, or similar structure that holds a financial interest in any entity transacting with RFLD.
- Having outstanding personal loans to or from any person or entity transacting with RFLD.

7.2.2 Employment and Professional Interests

- Holding a second job, consultancy, advisory role, or board directorship with any organisation that does or seeks to do business with RFLD, competes with RFLD for funding, or whose interests conflict with RFLD's mission.
- Being a current or recently departed (within 24 months) employee, officer, or director of any current or prospective RFLD supplier, partner, or competitor.
- Being under active consideration for employment, a contract, or a board position with any RFLD supplier, partner, or competitor while holding an RFLD role.

7.2.3 Personal and Family Relationships

- Being in a romantic, spousal, domestic partnership, or close personal relationship with any person involved in a decision that directly affects RFLD — including supplier employees, partner staff, beneficiaries, donor representatives, or applicants for RFLD employment.
- Being a first- or second-degree relative of any person in any of the above categories — parents, siblings, children, grandparents, aunts, uncles, cousins, in-laws, or step-family members.
- Being a close personal friend of a person involved in a relevant RFLD decision, where the relationship is of such a nature that a reasonable person would question the Covered Person's impartiality.

7.2.4 Political and Advocacy Interests

- Holding a formal role in a political party, government body, or electoral campaign whose interests could conflict with RFLD's advocacy positions.
- Being an active candidate for elected office while holding an RFLD role, without prior written disclosure to and approval from the Executive Director.
- Using RFLD's institutional credibility, communications platforms, or resources to advance a personal political agenda.

7.2.5 Post-Employment Restrictions

For 12 months after leaving any RFLD employment or board role, former Covered Persons must not: represent any organisation in dealings with RFLD where they previously had an RFLD decision-making role;

use confidential RFLD information for personal advantage or to benefit any third party; or actively solicit RFLD's donors, partners, or staff on behalf of a competing or successor organisation.

7.3 Disclosure Process — Step by Step

Step	Action Required	Timing and Form
1	Identify: Recognise that a personal interest, relationship, or circumstance could affect — or appear to affect — your impartiality in an RFLD decision.	As soon as the potential conflict is identified
2	Pause: Do not participate in any RFLD discussion, evaluation, vote, or decision connected to the potential conflict until the disclosure is reviewed.	Immediately — before the relevant meeting or decision
3	Disclose: Complete the Conflict of Interest Disclosure Form (Annex I) and submit to the Finance Manager. Where the conflict involves the Finance Manager, submit to the Executive Director. Where it involves the ED, submit to the Board Chair via admin@rflgd.org (marked Confidential).	Within 2 business days of identifying the conflict
4	Review: Finance Manager (or ED or Board Chair as applicable) reviews the disclosure and issues a written management decision — cleared, partial restriction, or full recusal.	Within 5 business days of receiving the disclosure
5	Record: The disclosure and management decision are entered in the Conflict of Interest Register maintained by the Finance Manager.	Immediately after decision
6	Annual Declaration: All Covered Persons submit an Annual Conflict of Interest Declaration (Annex I) by 31 January each year, even where no conflict exists. Board members submit before each Board meeting.	31 January annually; before each Board meeting for Board members

7.4 Graduated Management of Disclosed Conflicts

Severity	Description	Management Measure
Negligible	Perceived or incidental; no actual influence possible; relationship is remote.	Log in register. Individual may proceed. Note for future reference.
Minor	Potential conflict; relationship exists but individual has no current decision-making role in the relevant area.	Log in register. Individual may proceed with enhanced transparency — a colleague is briefed and can flag any concern.
Moderate	Real conflict; individual currently has a role in a relevant decision or evaluation.	Formal recusal from the specific decision, evaluation, or meeting agenda item. Independent person substituted. Documented in writing.
Serious	Significant financial or close personal interest; individual has material influence over a relevant decision.	Full recusal from all related matters. Supervisor or ED assumes responsibility. HR file notation. Enhanced monitoring for duration of relevant activity.
Severe / Undisclosed	Serious conflict that was not disclosed when it should have been. Suggests deliberate concealment.	Disciplinary process initiated. Temporary removal from affected decisions pending process. Potential dismissal. Board notification. May be treated as equivalent to fraud.

7.5 Board Member Conflict of Interest

Board members bear heightened fiduciary obligations and therefore face additional conflict of interest requirements:

- Submit a written Conflict of Interest Declaration before every Board meeting — in addition to the annual declaration.
- Verbally declare any conflict at the start of any Board discussion where their personal interest could be relevant.
- Leave the meeting room — physically or virtually — during discussion and voting on any matter in which they have a declared conflict. The departure and its reason must be recorded in the Board minutes.
- Not vote on any resolution in which they have a conflict.
- Not use their Board role to advance personal, professional, or family interests at RFLD's expense.
- Where a Board member believes another Board member has an undisclosed conflict in a matter, they must raise this with the Board Chair privately before the meeting.

7.6 The Conflict of Interest Register

The Finance Manager maintains the RFLD Conflict of Interest Register — a secure, confidential log of all disclosed conflicts, management decisions, and annual declarations. The register is reviewed annually by the Ethics Committee as part of the Annual Ethics Report. Access is restricted to the Finance Manager, Executive Director, Ethics Committee members, and authorised auditors. Individual entries are not shared without consent except where legally required or in the context of a formal investigation.

8. Reporting Channels — Consolidated Framework

⚠ KPMG EFFICIENCY AUDIT FINDING 14 (2025) — FULLY REMEDIATED IN THIS SECTION: This Policy consolidates all RFLD integrity reporting channels and specifies the confidential hotline number for each office. These details replace and supersede all previous fragmented references across RFLD's policy documentation. Every Covered Person must be familiar with at least one of these channels.

8.1 The Duty to Report

Every Covered Person who becomes aware of, has reasonable grounds to suspect, or witnesses a violation — or anticipated violation — of this Policy has an individual, personal, and non-delegable obligation to report it. This obligation:

- Applies regardless of the seniority, position, or institutional standing of the person involved in the suspected violation.
- Applies regardless of whether the Covered Person is certain — a reasonable, honest suspicion is sufficient and required.
- Applies even where the Covered Person has some personal involvement or is uncertain about the full facts.
- Cannot be discharged by informally mentioning the concern to a colleague, waiting to see if someone else reports, or assuming that management already knows.
- Failure to report a known violation is itself a disciplinary offence under Section 5.8 (Aiding and Abetting) of this Policy.

8.2 The Five Official Reporting Channels

RFLD provides five independent and parallel reporting channels. Every channel is monitored by the Ethics Committee. Reports may be made anonymously through any channel. A reporter may use more than one channel simultaneously. All channels are available to internal and external reporters.

Channel	Full Contact Details	Best Used For
Secure Online Report Form	URL: https://rflgd.org/rfld-internal-policies/ Navigate to: Ethics & Reporting → Open Secure Form Available 24 hours a day, 7 days a week Supports English and French submissions	Named or anonymous reports; attaching documentary evidence; reporters in any country with internet access
Confidential Ethics Email	integrity@rflgd.org Monitored exclusively by the Ethics Committee Not accessible to RFLD programme, finance, or operations staff Encrypted communication available on request	Detailed written complaints; forwarding confidential documents; requesting a private dialogue with the Ethics Committee; formal complaints
Confidential Phone Hotlines	Cotonou Headquarters (Benin): +229 01 50 02 46 19 Accra Regional Hub (Ghana): +233 53 496 8866 Dakar Office (Senegal): +221 77 541 84 37 Banjul ACHPR Liaison (Gambia): +229 01 50 02 46 19 (via Cotonou HQ) Available during business hours; voicemail monitored outside hours	Urgent verbal reports; reporters who prefer not to write; callers may remain anonymous; immediate safety concerns requiring urgent response
Confidential Postal Mail	Mark envelope: CONFIDENTIAL — ETHICS COMMITTEE ONLY RFLD Ethics Committee RFLD Headquarters Hounsa, Rue de l'Université Agricole Porto-Novo / Cotonou, Benin	Written reports with physical evidence; reporters without internet or phone access; formal documented complaints requiring a physical record
Direct to Board Chair	Via: admin@rflgd.org Subject line: 'For Board Chair — Ethics — CONFIDENTIAL' Or sealed envelope to Cotonou HQ Marked: For Board Chair Only — Confidential For use when the concern involves the Executive Director or senior management conduct	Reports involving the Executive Director; concerns about Ethics Committee handling; Board governance integrity; situations where internal channels have been compromised

8.3 What to Include in a Report

A report with more detail enables a more thorough and faster investigation. Reporters are encouraged to include as much of the following as they are safely able to provide:

- The nature of the concern (bribery, fraud, conflict of interest, misappropriation, retaliation, obstruction, etc.).
- The name(s) or description(s) of the person(s) involved, if known.
- The approximate date(s), time(s), and location(s) of the conduct.
- A factual description of what happened — what was said, done, or observed.
- Names or descriptions of any witnesses.
- Any documentary evidence available — invoices, emails, photographs, receipts, contracts, messages.
- Whether the Covered Person believes the conduct is ongoing or has ended.
- Whether the reporter has already raised the concern informally and with whom.

A report without all of the above is still accepted, logged, and investigated to the extent possible. Reporters must share only what they know and must not speculate or embellish. A good-faith report based on incomplete information is fully protected.

8.4 Partner and External Reporters

RFLD's partners, suppliers, beneficiaries, and members of the public who have integrity concerns related to RFLD activities are equally welcome and encouraged to report through any channel above. External reports receive the same treatment as internal reports: logged, acknowledged, and investigated under the same procedures. RFLD will not retaliate against any external party — including by withdrawing a grant, terminating a contract, or reducing programme support — for raising a concern in good faith.

9. Investigation Process — Detailed Procedures

9.1 Governing Principles of Investigation

All investigations conducted under this Policy must adhere to the following principles. Departure from these principles invalidates the investigation and may expose RFLD to legal challenge:

Principle	What It Requires
Presumption of Innocence	The subject of the investigation is presumed innocent until the investigation produces findings. No adverse action — other than precautionary measures — may be taken before findings are reached.
Due Process	The subject must be: informed of the nature of the allegations against them; given a genuine opportunity to respond to those allegations; informed of the outcome in writing; and given the right to appeal.
Fairness to the Reporter	The reporter must be protected from retaliation throughout (see Section 11). Their identity is protected to the maximum extent possible consistent with a fair investigation.
Impartiality	All investigators must be free of personal or professional conflicts of interest in the case. Any investigator with a connection to either party must recuse themselves.
Confidentiality	All aspects of an investigation — allegations, evidence, interviews, deliberations, and outcomes — are strictly confidential. Participants are bound by confidentiality. Breaches of investigation confidentiality are themselves disciplinary offences.
Promptness	Investigations are conducted without undue delay. The timelines in Section 9.5 are mandatory and may only be extended with the specific authorisation described there.
Proportionality	The resources and intensity of the investigation are proportionate to the seriousness, complexity, and nature of the allegation. Minor procedural violations do not require the same process as serious financial fraud.
Documentation	Every step of every investigation is documented contemporaneously. The investigation record must be sufficient for an independent reviewer to understand what happened, what was found, and why the outcome was reached.

9.2 Intake and Triage

Upon receipt of any report through any channel, the following steps occur:

- The Ethics Committee Secretary logs the report in the Ethics Case Tracking Log (Annex III) within 24 hours of receipt, assigning a unique Case Reference Number.
- An acknowledgement is sent to the reporter (where contact details are provided) within 3 business days, confirming receipt and providing the Case Reference Number for follow-up.
- The Ethics Committee Chair assigns a Lead Investigator with no conflict of interest in the matter — a qualified RFLD staff member, Board member, or external investigator depending on the severity and seniority involved.
- Within 5 business days, the Lead Investigator completes a Preliminary Assessment determining: (a) whether the allegation falls within the scope of this Policy; (b) whether it contains sufficient credible detail to investigate; (c) the appropriate response — full investigation, referral to another process (HR, Safeguarding), monitoring, or closure with reasons. The assessment is documented.

9.3 Interim Protective Measures

Where the preliminary assessment identifies a risk of ongoing harm, evidence destruction, or material damage to RFLD pending full investigation, the Ethics Committee Chair may authorise interim protective measures. These are precautionary and must not be treated or communicated as punitive or as implying guilt:

- Temporary reassignment of the subject away from the affected programme, process, or relationship.
- Temporary suspension of the subject on full pay (where a serious allegation is made against an employee and continued presence would risk evidence integrity or beneficiary safety).
- Securing, copying, or restricting access to financial records, electronic devices, or other relevant evidence.

- Temporarily suspending specific payments, sub-grant disbursements, or financial commitments connected to the matter.
- Notifying the relevant donor confidentially, if required by the grant agreement.

All interim measures are documented, time-limited, and communicated in writing to the subject with a clear statement that they are precautionary and not a finding of wrongdoing.

9.4 Full Investigation Procedure

Where a full investigation is warranted, the following steps are completed by the Lead Investigator:

11. Develop an Investigation Plan within 5 business days of the preliminary assessment decision — specifying: scope; evidence to be gathered; persons to be interviewed; timeline; reporting structure; and whether external legal or specialist support is needed.
12. Gather documentary evidence systematically — financial records, communications, system logs, physical assets, photographs, contracts, and any other relevant material. Evidence is secured, copied, and catalogued.
13. Interview the reporter (if they consented to disclosure), key witnesses, and — at an appropriate stage once sufficient evidence is gathered — the subject. Each interview is documented in writing, reviewed by the interviewee for accuracy, and signed. Interviewees may be accompanied by a trusted colleague or union representative. Refusal to participate in an interview is noted and may be considered as part of the assessment of evidence.
14. Provide the subject with the opportunity to review the allegations and the material evidence gathered against them, and to respond in writing or in person. The subject is given a minimum of 5 business days to prepare their response.
15. Prepare a draft Investigation Report covering: background and scope; summary of evidence gathered; assessment of credibility and weight of evidence; findings of fact; conclusion (violation found / not found / inconclusive); and recommended sanction if a violation is found. Share the draft with the subject for comment within 5 business days.
16. Finalise the Investigation Report incorporating the subject's comments where relevant. Present to the Ethics Committee with the complete investigation file.

9.5 Investigation Timelines

Stage	Standard Deadline	Maximum Extension
Report received, logged, and reference number assigned	Within 24 hours	Not extendable
Acknowledgement sent to reporter	Within 3 business days	Not extendable
Lead Investigator assigned	Within 3 business days of receipt	Not extendable
Preliminary Assessment completed	Within 5 business days of receipt	5 additional days — Chair approval required
Investigation Plan developed	Within 5 business days of investigation decision	Not extendable
Subject notified of investigation (and nature of allegation)	Within 5 business days of investigation decision	Not extendable
Evidence gathering and interviews completed	Within 20 calendar days of investigation start	10 additional days — documented justification required
Subject response to draft report	5 business days after receiving draft	3 additional days on reasonable request
Final Investigation Report submitted to Ethics Committee	Within 30 calendar days of investigation start	15 additional days — ED written approval required
Ethics Committee issues decision	Within 10 business days of receiving final report	Not extendable
Decision communicated to subject in writing	Within 5 business days of	Not extendable

Stage	Standard Deadline	Maximum Extension
	Committee decision	
Appeal filed by subject	Within 15 business days of receiving decision	Not extendable
Appeal decided	Within 20 business days of receiving appeal	Not extendable

9.6 Cases Involving Senior Staff, Board Members, or External Parties

Where an investigation involves the Executive Director, the Ethics Committee Chair role passes to the Board-nominated member. The full Board is notified within 24 hours. An external investigator is mandatory. The Board retains sole authority to determine the outcome and apply any sanction. Where a case involves a Board member, the Board Chair manages the process with external investigative support. Where the Board Chair is implicated, the Board Deputy Chair assumes the role.

Where an investigation involves a partner organisation or supplier, the Ethics Committee may conduct the investigation jointly with the partner's own oversight body, commission an independent external investigator, or refer the matter directly to relevant authorities. RFLD reserves the right to suspend the partnership or contract as a precautionary measure pending the outcome.

9.7 Donor Notification Obligations

RFLD's grant agreements with Sida, GIZ/BMZ, and other institutional donors contain specific requirements for notifying the donor when an integrity incident occurs. The Finance Manager maintains a Donor Notification Matrix identifying the notification trigger, timeline (typically 30–72 hours from confirmed suspicion), and required content for each active grant. The Executive Director is personally responsible for ensuring timely donor notification. A donor notification does not constitute an admission of guilt — it is a disclosure obligation and an expression of RFLD's commitment to transparency with institutional partners.

10. Sanctions and Consequences

10.1 Principles of Sanctioning

Sanctions serve three purposes: accountability (ensuring consequences for wrongdoing), deterrence (discouraging future violations), and protection (preventing continued harm to RFLD, its beneficiaries, and its resources). RFLD applies sanctions that are proportionate, consistent, fair, and — where applicable — consistent with national employment law. Mitigating and aggravating factors are considered in every case before a sanction is decided.

10.2 Mitigating Factors

- Voluntary self-disclosure of the violation before any investigation commenced.
- Full, genuine, and timely cooperation with the investigation, including proactive evidence sharing.
- Demonstrated remorse and genuine commitment to remediation and future compliance.
- An isolated incident with no prior disciplinary history.
- The individual was under significant external duress, threat, or pressure when the violation occurred.
- The violation caused minimal actual harm and was promptly remediated.
- The violation resulted from genuine misunderstanding of the Policy rather than deliberate misconduct.

10.3 Aggravating Factors

- Deliberate concealment of the violation or active obstruction of the investigation.
- Senior position — those in positions of greater authority and trust bear proportionately greater responsibility.
- Deliberate abuse of authority or trust to commit the violation.
- Involvement of beneficiaries, programme participants, or otherwise vulnerable persons.
- Significant financial harm to RFLD, its beneficiaries, or donor funds.
- Serious reputational damage to RFLD with donors, partners, or the public.
- Prior disciplinary warnings or known integrity violations.
- Evidence of premeditation — the violation was planned rather than opportunistic.
- Involvement of multiple parties — organised collusion or conspiracy.

10.4 Range of Sanctions

Sanction	Description and Application	Typical Triggering Conduct
Verbal Warning	Formal spoken reprimand recorded in the personnel file. Valid for 6 months.	Minor conflict of interest not promptly disclosed; small undeclared gift; minor procedural oversight.
Written Warning	Formal written notice of violation and required improvement. Valid for 12 months.	Repeated minor violations; moderate undisclosed conflict; pattern of gift register failures.
Final Written Warning	Last formal warning before dismissal. Valid for 12 months. May include mandatory ethics training.	Serious conflict of interest; significant undeclared gift; deliberate evasion of controls.
Mandatory Training	Required completion of specific ethics, anti-corruption, or compliance programme. Applied alone or alongside other sanctions.	First-time procedural violations stemming from ignorance; gift policy misunderstandings; reporting failures.
Suspension with Pay	Temporary removal from role pending investigation or as a sanction in itself. Duration specified in writing. Precautionary during investigations.	Serious misconduct where continued presence risks evidence integrity or staff/beneficiary safety.

Sanction	Description and Application	Typical Triggering Conduct
Demotion or Reassignment	Reduction in grade or reassignment to a different role where the conflict or risk is eliminated or reduced.	Conflict of interest in specific area; breach of trust in current role; serious but non-dismissal level misconduct.
Termination for Cause	Dismissal for serious misconduct. Conducted in accordance with the RFLD HR Policy and applicable national employment law.	Serious fraud; significant conflict of interest exploited for personal gain; bribery; deliberate falsification of records.
Summary Dismissal	Immediate termination without notice for gross misconduct where continued employment would be untenable.	Bribery of a public official; misappropriation of donor funds; PSEAH violation involving a beneficiary; obstruction of a formal investigation.
Recovery of Funds	Demand for repayment of misappropriated or improperly applied funds. May be pursued through deduction from final pay (where legally permitted), civil proceedings, or insurance claims.	Any confirmed fraud, embezzlement, or misappropriation; falsified expenses; improper use of RFLD resources.
Procurement Debarment	Permanent exclusion from future RFLD procurement, contracting, or sub-granting.	Confirmed bribery in procurement; collusion between bidders; submission of fraudulent bids or invoices.
Organisational Debarment	Permanent exclusion from future RFLD employment, Board membership, partnership, or any other engagement.	Confirmed fraud; confirmed bribery; serious PSEAH violation; obstruction of justice; serious reputational harm.
Referral to Authorities	Referral to national law enforcement, relevant regulatory body, INTERPOL, donor investigations unit, or sector-wide debarment list.	Any suspected criminal conduct — bribery, fraud, money laundering, or serious PSEAH violation — where evidence meets the threshold for referral.
Donor Notification	Mandatory notification to relevant donor(s) in accordance with the terms of the grant agreement — separate from and in addition to any employment sanction.	All Category A violations (bribery, fraud, misappropriation, PSEAH); any confirmed violation resulting in loss of donor funds.

10.5 Appeal Process

Any employee who receives a sanction under this Policy has the right to appeal to the Executive Director (or to the Board Chair where the ED was involved in the decision) within 15 business days of receiving the written decision. The appeal must specify the grounds: procedural grounds (a fair process was not followed as required by this Policy) and/or substantive grounds (the findings of fact are not supported by the evidence). The appeal decision-maker may uphold, reduce, increase, or substitute the sanction, or order a re-investigation. The appeal decision is final within RFLD's internal processes. External legal remedies remain available as required by applicable national employment law.

11. Whistleblower and Reporter Protection

11.1 Scope of Protection

The following persons are fully protected under this Policy from the moment they exercise their right to report:

- Any person who makes a good-faith report through any of the five channels specified in Section 8.
- Any person who provides evidence, information, witness accounts, or testimony in the course of an investigation.
- Any person who refuses to participate in conduct they reasonably believe would violate this Policy, even if instructed to do so by a more senior person.
- Any person who raises integrity concerns informally with a colleague, line manager, or Ethics Committee member — even where a formal report has not yet been submitted.
- Any person who supports, assists, or encourages another person to make a legitimate report.

11.2 Forms of Prohibited Retaliation

No Covered Person may take any of the following actions against a reporter, witness, or any protected person under Section 11.1:

- Dismissal, forced resignation, non-renewal of contract, or any other termination of the employment or engagement relationship.
- Demotion, salary reduction, denial of promotion, or adverse change to any term or condition of employment.
- Exclusion from meetings, communications, programme activities, decisions, or organisational life.
- Negative performance assessments, references, or evaluations motivated by — or coinciding suspiciously with — the report.
- Harassment, bullying, social exclusion, public humiliation, or any act creating a hostile working environment.
- Threats — express, implied, direct, or indirect — against the reporter or their family, community, or other relationships.
- Disclosure of the reporter's identity to the subject of the report without the reporter's express written consent.
- Withdrawal of programme support, grant funds, or organisational benefits from a partner or beneficiary because of their report.

11.3 Response When Retaliation Is Suspected

Any person who believes they have experienced retaliation must report it immediately to the Ethics Committee through any available channel. The Ethics Committee will:

17. Acknowledge the retaliation report within 24 hours.
18. Implement immediate protective measures — separating the reporter from the alleged retaliator, adjusting reporting lines, authorising remote working, or other measures as appropriate.
19. Investigate the retaliation as a separate, independent case — not merged with the original integrity case.
20. Apply sanctions to the retaliating person commensurate with the seriousness of the retaliation — which may be as severe as summary dismissal.

Retaliation is treated by RFLD as a Category A violation — equivalent in seriousness to a direct integrity violation. There is no tolerance for it at any level of the organisation.

11.4 Anonymous Reports

RFLD accepts and takes seriously anonymous reports. The Ethics Committee investigates any anonymous report to the extent possible given the information available. Where an anonymous report is too vague to act on immediately, it is retained in the Ethics Case Tracking Log. If subsequent reports raise similar concerns, the earlier anonymous report may provide corroboration. Anonymous reporters cannot receive case updates but may follow up using their Case Reference Number via the secure online form.

11.5 False and Malicious Reports

RFLD carefully distinguishes between: (a) honest reports that turn out to be mistaken, based on incomplete information or genuine misunderstanding — fully protected; (b) reports made in good faith but without certainty — fully protected; and (c) reports that the reporter knows to be false and that are made primarily to harm the subject — not protected. A person who knowingly makes a false report may themselves be subject to disciplinary action and, where appropriate, referral to relevant authorities.

12. Third-Party Obligations — Partners, Suppliers, and Sub-Grantees

12.1 Contractual Integrity Provisions

All RFLD sub-grant agreements, partnership agreements, consultancy contracts, and procurement contracts must include the following provisions as standard, non-negotiable clauses. These clauses are maintained by the Finance Manager in RFLD's standard contract templates and must not be removed or weakened:

- Anti-corruption clause: Binding the third party to the standards of this Policy and prohibiting bribery, fraud, facilitation payments, and misuse of RFLD funds.
- Conflict of interest clause: Requiring disclosure of any interest that could affect impartiality in matters related to the RFLD relationship.
- PSEAH clause (for field-facing engagements): Cross-referencing RFLD's Safeguarding and PSEAH Policy obligations.
- Mandatory reporting clause: Obliging the third party to report any suspected violation of this Policy to RFLD's Ethics Committee within 48 hours of becoming aware.
- Audit clause: Granting RFLD and relevant donors the right to access the third party's financial and programme records related to RFLD-funded activities at any time on reasonable notice.
- Termination clause: Entitling RFLD to terminate the agreement with immediate effect upon confirmation or credible ongoing allegation of an integrity violation.
- Recovery clause: Entitling RFLD to recover all funds paid in connection with a confirmed integrity violation.

12.2 Partner Integrity Due Diligence

Before entering any new sub-grant agreement above USD 5,000, or any partnership agreement regardless of value, RFLD must conduct integrity due diligence proportionate to the value and risk of the relationship. At a minimum, all partners above USD 5,000 are:

- Screened against UN, EU, World Bank, OFAC, and Sida debarment and sanctions lists.
- Asked to sign the RFLD Third-Party Integrity Declaration (Annex V), confirming no prior corruption findings, no outstanding integrity investigations, and commitment to this Policy's standards.
- For relationships above USD 25,000: required to provide a self-assessment questionnaire and details of their own anti-corruption policies and governance structures.

12.3 Responding to Partner Integrity Incidents

When RFLD becomes aware of an integrity incident involving a partner organisation or supplier, the Ethics Committee:

21. Assesses severity and immediate risk within 24 hours.
22. Notifies the relevant donor if required by the grant agreement.
23. Informs the partner in writing of the concern and the RFLD response.
24. Determines an appropriate response: (a) providing capacity support and enhanced monitoring; (b) imposing conditions on future disbursements; (c) suspending the relationship pending investigation; or (d) terminating the relationship. The response is documented and reported to the Board.

13. Training, Culture, and Awareness

13.1 Mandatory Training Requirements

Who	Training Content	Frequency and Deadline
All new staff and consultants	Ethics and anti-corruption induction; conflict of interest overview; reporting channels with contact details; gifts and hospitality limits	Within 30 days of commencement — mandatory pre-condition for unsupervised work
All existing staff	Annual policy refresher covering any updates; case studies from Ethics Committee annual report; emerging risk areas; reporting reminder	Every 12 months; by 28 February each year
Ethics Committee members	Advanced investigation methodology; international anti-corruption standards; interview techniques; evidence handling; legal liability	Upon appointment; annually thereafter
Finance staff and procurement officers	Financial controls; procurement integrity; fraud red flags; three-way match; facilitation payment handling	Upon appointment; annually
Programme staff in field roles	Contextual anti-corruption for specific operating environments; PSEAH linkages; community-level reporting; facilitation payment protocol	Upon deployment; annually
Board and committee members	Fiduciary duties; conflict of interest for trustees; governance liability; Ethics Committee oversight	Upon joining Board; annually
Implementing partners (multi-year grants)	RFLD standards summary; reporting obligations; PSEAH cross-reference; sub-grantee responsibilities	At partnership inception; annually for multi-year partners

13.2 Building an Integrity Culture Beyond Compliance

Training alone does not create an integrity culture. RFLD commits to the following additional and ongoing measures:

- **Leadership by example:** The Executive Director and Board members visibly uphold and actively champion this Policy in all their professional conduct, communications, and decisions. Integrity culture begins at the top.
- **Annual Ethics Report:** The Ethics Committee publishes an anonymised Annual Ethics Report on rflgd.org/rfld-report/ each year, covering cases received, investigations conducted, outcomes, and lessons learned. Transparency in self-reporting demonstrates accountability to donors, partners, and the public.
- **Open Ethics Committee:** Any Covered Person — not only formal reporters — may approach any Ethics Committee member informally for guidance on whether a situation they are encountering raises a conflict or integrity concern. This 'ask before acting' culture reduces violations by enabling people to seek guidance before a problem becomes a case.
- **Induction priority:** Ethics and integrity are introduced in the first week of all new staff onboarding — not as a compliance footnote but as a central expression of who RFLD is and why it operates the way it does.

- All-staff communications: The Finance Manager sends all-staff briefings at least quarterly covering Policy updates, case learnings from the Ethics Report, and emerging integrity risk areas specific to RFLD's operational context.
- Feminist lens on integrity: RFLD applies a feminist and intersectional analysis to its integrity governance — recognising that power imbalances, gender dynamics, and structural inequalities shape both how corruption occurs and who is most likely to be silenced when it does. Integrity systems are designed to be accessible, safe, and effective for people at all levels of the organisation.

14. Governance and Oversight — Ethics Committee

14.1 Composition and Roles

Position	Role Holder	Responsibilities
Chair	Executive Director (non-voting in staff cases)	Convenes Committee; represents RFLD to donors in integrity matters; approves sanctions above formal written warning; signs donor notifications.
Finance Member	Regional Finance Lead	Reviews all financial integrity cases; manages Conflict of Interest Register and Gifts Register; prepares donor notifications; tracks sanctions and remediation.
Programme Member	Senior Programme Officer (appointed by ED annually)	Reviews programmatic integrity cases; partner incident management; field investigation support.
Board Member	Nominated Board member (rotates every 2 years)	Provides independent Board-level oversight; handles cases involving senior management; approves sanctions in senior staff cases.
Secretary	Finance Officer (non-voting)	Manages Ethics Case Tracking Log; administers all Committee correspondence; prepares Annual Ethics Report drafts; maintains all registers.
External Adviser (ad hoc)	Qualified external investigator or legal counsel	Engaged for complex, sensitive, or senior-level investigations; provides independent legal analysis; mandatory for cases involving the ED.

14.2 Meeting Schedule and Quorum

The Ethics Committee meets monthly in regular session to review open cases, receive investigation updates, and consider sanctions. An extraordinary session is convened within 72 hours when a report requiring urgent action is received. Quorum requires at least three members including the Chair (or, in the Chair's absence, the Board Member). Decisions require consensus; where consensus cannot be reached, the matter is escalated to the full Board.

14.3 Cases Involving the Executive Director or Board

Where an allegation involves the Executive Director, the Chair role passes immediately to the Board-nominated Committee member. The full Board is notified within 24 hours. An external investigator is mandatory. The Board holds sole authority over the outcome and any sanction. Where a Board member is the subject, the Board Chair manages the process with external investigative support. Where the Board Chair is implicated, the Board Deputy Chair (or a Board member elected by other Board members) assumes the role.

14.4 Annual Ethics Report

The Ethics Committee produces an Annual Ethics Report each year for publication on rflgd.org/rfld-report/. The report includes all of the following, fully anonymised so no individual can be identified:

- Total number of reports received, disaggregated by reporting channel.
- Total number of preliminary assessments completed and outcome (full investigation / referral / closure with reasons).
- Total number of full investigations initiated.
- Summary of findings (violation found / not found / inconclusive) across all investigations.
- Categories of violations found (bribery / fraud / conflict of interest / misuse of resources / other).
- Sanctions applied — in aggregate by category, not by individual.
- Training completion rates across all staff categories.
- Ethics Committee recommendations for policy or systems improvement.

The Annual Ethics Report is presented to the Board for approval before publication, and submitted to Sida and other relevant donors as part of RFLD's annual compliance reporting.

15. International Standards Alignment

This Policy has been developed in alignment with the following international frameworks. Where any provision of this Policy falls below the standard required by a specific donor agreement or applicable law, the higher standard prevails:

Framework	Key Provisions Reflected in This Policy
UN Convention Against Corruption (UNCAC), 2003	Articles 8 (codes of conduct for public officials as adapted to CSO context), 12 (private sector obligations), 33 (whistleblower protection), and 34 (consequences of corruption acts).
African Union Convention on Preventing and Combating Corruption (AUCPCC), 2006	Articles 4 (legislative and other measures), 5 (legislative and related measures for the private sector), and 22 (protection of witnesses and informants).
OECD Good Practice Guidance on Internal Controls, Ethics, and Compliance	Risk-based approach to compliance; proportionate controls; clear escalation; tone from the top; training and communication requirements.
Transparency International Business Principles for Countering Bribery	Zero tolerance for facilitation payments; gifts and hospitality framework; conflict of interest framework; investigation procedure standards.
Sida's Anti-Corruption Policy (Policy for Development Cooperation)	Mandatory donor notification; zero tolerance for corruption in aid delivery; partner due diligence requirements; whistleblower protection standards.
GIZ/BMZ Anti-Corruption Compliance Standards	Integrity screening of sub-contractors and partners; training requirements; management commitment standards; case reporting obligations.
BOND (UK INGO Network) Integrity Framework	Governance accountability; Board oversight of integrity; annual reporting standards; case management best practice.
Interaction (US NGO Association) Anti-Corruption Standards	US-source fund integrity requirements; financial management linkage; Board fiduciary obligations.

16. Policy Review and Version Control

16.1 Review Schedule

This Policy is reviewed annually by the Executive Director and the Ethics Committee, with approval by the Board before taking effect. An out-of-cycle review is triggered by any of the following: a material integrity incident revealing a gap in the Policy; a donor instruction or grant condition requiring policy change; a significant change in RFLD's scale, structure, or operating environment; a change in applicable national or international law; or a finding by the external auditor relating to integrity governance.

16.2 Communication of Changes

All amendments are communicated to all Covered Persons within 30 days of Board approval. For material changes, an all-staff briefing or training session is held within 60 days of approval. Implementing partners are notified of changes that affect their obligations under existing sub-grant agreements.

16.3 Version History

Version	Date	Summary of Changes	Approved By
1.0	May 2026	Initial adoption — developed in direct response to KPMG Efficiency Audit Findings (2025), in particular Finding 14 (missing hotline number; fragmented reporting channels). Consolidates all RFLD integrity mechanisms into one authoritative document. Specifies five reporting channels with full contact details. Aligned to UNCAC, AUCPCC, Sida, and GIZ/BMZ requirements.	Board of Directors, RFLD

Policy Approval

Executive Director — Gloria Sekonou	Board Chair	Ethics Committee Lead
Name:	Name:	Name:
Title:	Title:	Title:
Signature:	Signature:	Signature:
Date:	Date:	Date:

ALL REPORTING CONTACTS

Secure Online Form: rflgd.org/rfld-internal-policies/ → Open Secure Form
 Ethics Email: integrity@rflgd.org
 Cotonou HQ (Benin): +229 01 50 02 46 19
 Accra (Ghana): +233 53 496 8866
 Dakar (Senegal): +221 77 541 84 37
 Banjul (Gambia): +229 01 50 02 46 19 (via Cotonou)
 Postal: RFLD Ethics Committee (CONFIDENTIAL), Cotonou HQ, Benin
 Board Chair (senior cases): admin@rflgd.org — subject: 'For Board Chair — Ethics — CONFIDENTIAL'

Annex I — Annual Conflict of Interest Disclosure Form

INSTRUCTIONS

Complete annually by 31 January. New staff: complete within 30 days of start date. Board members: complete before each Board meeting. Submit to Finance Manager. Retain signed copy in personnel file.

Full Name		Title / Position	
Office / Location		Declaration Year / Date	
Declaration Type	☐ Annual Declaration (31 January) ☐ Ad Hoc — conflict identified on: _____ ☐ Board Pre-Meeting Declaration		

Section A — Interest and Relationship Screening

Question	Yes	No	Unsure
Do you hold any financial interest (shares, partnership interest, directorship) in any organisation that does or may do business with RFLD?	☐	☐	☐
Do you receive any income, fees, or other financial benefit from any organisation other than RFLD?	☐	☐	☐
Is any member of your immediate or extended family employed by, or does any family member hold a financial interest in, an RFLD supplier, partner, or competitor?	☐	☐	☐
Are you in a personal relationship (romantic, domestic, close friendship) with any person involved in RFLD decisions (procurement, hiring, grants, sub-granting)?	☐	☐	☐
Have you accepted any gift or hospitality above USD 60 in value from any single external party in the past 12 months?	☐	☐	☐
Are you a member of, or formally affiliated with, any political party, government body, or elected office?	☐	☐	☐
Have you been employed by, or served on the board of, any current RFLD supplier, partner, or competitor in the past 24 months?	☐	☐	☐
Do you have any outstanding loans to or from any person or organisation that does business with RFLD?	☐	☐	☐
Do you have any other interest, relationship, or circumstance that could affect — or appear to affect — your impartiality in any RFLD decision?	☐	☐	☐

Section B — Details of Any 'Yes' or 'Unsure' Answer

Provide full details: name of organisation or person; nature of the relationship or interest; when it began; and why you believe you can / cannot act impartially in relevant RFLD decisions.

Section C — Declaration

I confirm that: (a) the information above is complete and accurate to the best of my knowledge; (b) I will promptly update this declaration if any relevant circumstances change during the year; (c) I understand that failure to disclose a known conflict of interest is a disciplinary offence under RFLD's Anti-Corruption and Conflict of Interest Policy (RFLD-POL-ACOI-v1.0).

Declarant — Signature & Date	Finance Manager Decision & Date
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Signature: _____

Date: _____

☐ No conflict — cleared to participate in all matters☐ Restricted — recused from: _____**Name / Signature / Date:**

Annex II — Gifts and Hospitality Register

INSTRUCTIONS

Log all gifts and hospitality received or given above USD 20. Submit to Finance Manager within 5 business days of receipt or giving. Reviewed quarterly by Finance Manager. Annual summary included in Ethics Committee Annual Report.

Date	Staff Member (Name & Role)	Description	USD Value	Received / Given	Source or Recipient	Source's Relationship to RFLD & Action Taken

Annex III — Ethics Case Tracking Log

INSTRUCTIONS

Maintained exclusively by the Ethics Committee Secretary. Confidential — access restricted to Ethics Committee members, Executive Director, Board, and authorised auditors. Case Reference Numbers are sequential and never reused.

Case Ref	Date Received	Channel Used	Reporter Type (Int/Ext/Anon)	Nature of Allegation	Investigation Status	Lead Investigator	Outcome

Annex IV — Facilitation Payment Incident Report

INSTRUCTIONS

Complete immediately after a facilitation payment demand. Submit to Finance Manager and Ethics Committee (integrity@rflgd.org) within 24 hours of the incident. Retain a copy in the relevant project file.

Staff Member Name and Title	
Date and Time of Demand	
Location (Country, City, Specific Place)	
Official / Agency Making the Demand	
Amount Demanded (Currency and USD Equivalent)	
Nature of Service Being Sought (e.g., permit, customs, visa)	
Witnesses Present	
Full Description of What Happened	
Was the Demand Refused? (Yes / No — if No, explain)	
Impact on RFLD Operations	
Supervisor Notified (Name and Date)	
Finance Manager Notified (Name and Date)	

Staff Member — Signature & Date	Finance Manager — Acknowledged & Date
Name:	Name:
Title:	Title:
Signature:	Signature:
Date:	Date:

Annex V — Third-Party Integrity Declaration

INSTRUCTIONS

To be signed by all implementing partners, significant sub-grantees (above USD 5,000), and key suppliers before contract or sub-grant agreement execution. File in the partner or vendor file.

Full Legal Name of Organisation		Country of Registration	
Registration Number		RFLD Contract / Sub-Grant Reference	
Name of Authorised Signatory		Title / Position	

Declarations

Declaration	Yes	No
Our organisation and its directors are not currently under investigation or sanction for fraud, corruption, or financial misconduct.	☐	☐
No principal of our organisation has been convicted of a fraud- or corruption-related offence in the past 5 years.	☐	☐
Our organisation is not listed on any UN, EU, World Bank, OFAC, or Sida debarment or sanctions list.	☐	☐
We have not offered any inducement, gift, or benefit to any RFLD staff member or Board member in connection with this engagement.	☐	☐
The prices and terms in our proposal or agreement have been determined independently and are not the result of collusion or coordination with any other bidder or party.	☐	☐
Our organisation has a written anti-corruption or code of conduct policy (or we commit to RFLD's Third-Party standards).	☐	☐
Our organisation complies with applicable labour laws and ILO core labour conventions.	☐	☐
We will promptly report to RFLD's Ethics Committee (integrity@rflgd.org) any integrity incident we become aware of that involves RFLD-funded activities.	☐	☐

Commitment

I/We confirm that the declarations above are accurate and complete. I/We commit to complying with RFLD's Anti-Corruption and Conflict of Interest Policy standards throughout the duration of our engagement with RFLD. I/We understand that any confirmed breach of these standards may result in immediate termination of the engagement and recovery of any funds paid.

Organisation Name & Official Stamp	Authorised Signatory — Name & Title	Signature & Date