



***Action on Development and Humanitarian Aid***  
**(ADHA)**

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**ANTICORRUPTION AND FRAUD POLICY**

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## **1. Anticorruption commitment**

Corruption is related to the breach of the principle of impartiality, by which a person makes an economic decision based on his own interests or relationships with third parties. This conduct poses risks to the company's reputation and increases exposure to other risks (financial, legal, operational, etc.). Furthermore, along with fraud, this practice slows economic development, weakens democracy and is detrimental to social justice and the rule of law, causing serious damage to the economy and society, and in many cases facilitating the operations of the organized crime.

we are committed to fighting corruption and fraud by establishing principles that must guide the behaviour of all the people who make up the company.

For these purposes, the Board of Directors of the Company, which is responsible for establishing the strategy and approving corporate policies, approves this Policy against corruption and fraud.

## **2. Purpose and scope**

The purpose of this policy is to project to all employees, as well as to third parties with whom it is related, a message of opposition to corruption and fraud, and Dominion's desire to eradicate it in all its activities, thereby contributing to compliance of the principles of the Global Compact established by the United Nations Organization, to which it is adhered. This policy is aligned with the Code of Conduct that guides and contains the principles and standards of conduct established by ADHA for its employees.

In accordance with the spirit of ADHA in terms of corruption and fraud, people who are part of ADHA must engage with integrity and transparency in business relationships, avoiding and condemning any suspected act of corruption or bribery. Likewise, ADHA has a commitment to permanent vigilance and sanction of fraudulent acts and conducts or that promote corruption in all its manifestations, maintenance of effective communication mechanisms and awareness of all employees and development of a business culture of ethics and honesty.

This Anticorruption Policy is mandatory for its directors, managers and employees. Third parties that collaborate, mediate or act for or on behalf of ADHA in operations and businesses, must observe the guidelines and principles contained in this policy.

## **3. Principles of action**

The principles governing the anticorruption and fraud policy are as follows:

- ADHA does not tolerate, allow or engage in any type of corruption, extortion or bribery in the performance of its activity, neither in the public nor the private sector.
- ADHA fosters a preventive culture based on the principle of non-tolerance of corruption in business, in all its forms, as well as towards the commission of other illegal acts and fraud situations and in the application of the principles of ethics and responsible behaviour. of all professionals, regardless of their hierarchical level and the country in which they work.

- The relations between its professionals with any public administration, authorities, public officials and other persons who participate in the exercise of the public function, as well as political parties and similar entities will be governed, in any case, by the principles of cooperation, transparency and honesty.
- There are training programs that guarantee the knowledge updating in this area for employees. In particular, ADHA professionals will receive and sign the Code of Conduct to prevent any case of fraud, corruption or bribery.
- ADHA promotes a transparency environment and makes it easy to consult doubts and report irregularities or breaches that lack ethics, integrity or violate the guidelines established in the Code of Conduct, through the Ethical Channel. Notifications and queries will be analysed and treated confidentially and in compliance with current legislation. These complaints may be made by employees, suppliers, third parties and shareholders who may report fraudulent conduct or the commission, by a professional, of any act contrary to legality or the rules of conduct of the Code of Conduct. ADHA agrees not to adopt any form of retaliation, direct or indirect, against people who have reported any irregularity.
- The risks associated with fraud, corruption and bribery are adequately covered in all internal procedures and in all processes involving a ADHA relationship.
- ADHA's relationship with its suppliers is based on legality, efficiency, and transparency. Ethical and responsible behaviour is one of ADHA's action pillars and its suppliers must comply with the policies, rules and procedures related to the prevention of corruption, bribery, and extortion. No supplier shall offer or grant to public officials, third parties or any employee, in the context of the business activity carried out for or on behalf of this, directly or indirectly, gifts or other unauthorized advantages, whether in cash or in other form of benefits, with the aim of obtaining favourable treatment in the granting or retention of contracts or personal benefits or for the supplier company.

#### **4. Breaches**

All ADHA members must comply with this policy. Failure to comply will be penalized in accordance with applicable labour laws and regulations. Failure by third parties may result in the modification or cancellation of the business relationship with the third party, in accordance with contractual obligations and applicable laws.

#### **5. Supervision and validity**

This policy will be supervised by the ADHA Board of Trustees, which will oversee updating and adapting it to new legal requirements and needs that are detected.

This document has been approved by the Board of Trustees at its meeting on April 10, 2022, and comes into force at the time of its approval.

**Date:**