



## Anti-Corruption and Fraud Policy

### Introduction

Da'em for Women Enhancement Association adopts clear, defined, and known policies regarding the prevention of fraud and corruption by its General Assembly members and employees. These policies have been established to protect employees and stakeholders dealing with the Association, and to facilitate and develop control systems over employees and all the Association's activities and events.

Therefore, the Association – and all its employees and members at various administrative levels – adopts this policy, and consequently, this policy and all its provisions are known and clear.

### Scope of the Anti-Corruption and Fraud Policy for the Da'em Association

This policy applies to all employees, collaborators, and contractors executing its contracts, whether their contracts are permanent or temporary. It includes all activities carried out by every employee, contractor, volunteer, member of the Administrative Board, or member of the General Assembly.

### Unlawful Acts and Activities Considered Violations Subject to Legal and Administrative Action

- 1 Requesting or accepting bribes to perform a rightful or wrongful act.
- 2 Accepting gifts from others within the scope of work relations.
- 3 Exploiting the position or achieving personal benefits.
- 4 Disclosing and divulging secrets related to tenders and projects.
- 5 Exploiting the Association's facilities or equipment for purposes other than those designated for work.
- 6 Divulging or waiving the Association's intellectual property rights.
- 7 Using the Association's logo for personal purposes.
- 8 Providing false information or false reports to achieve private or personal benefits.
- 9 Issues related to the security of its employees, members, or clients.
- 10 The Association's digital information and security.
- 11 Any acts that involve a violation of financial policies or laws related to money laundering or terrorism financing.
- 12 Any similar acts, whether mentioned or unmentioned, that would negatively affect the Association's entity and reputation and its members.

### Authority and Responsibility for Implementation

The Chief Executive Officer (CEO) of the Association, or their authorized representative, shall have the authority to verify and investigate any practices involving suspicions of fraud, corruption, or providing false information or other matters that harm the Association's interest or violate laws related to suspicions of money laundering, fund transfer, squandering, or bribery. This is done through an independent committee formed by the Chief Executive Officer (CEO) for this purpose.



All departments and sections in the Association shall adopt a policy for receiving complaints and raising these complaints to the CEO for decision-making and verification and investigation procedures.

The implementation of the policy is always governed by the permissibility of not abusing powers. Therefore, any measure must be preceded by coordination with the legal entity or legal advisor for the integrity of the investigation and to avoid infringing upon or exceeding the legal right.

The prevailing Jordanian laws and all relevant regulations and instructions, including the Association's General System, are referenced as follows:

### **Association Resources (Article 28 of the General System)**

According to Article 28 of the Association General Bylaw, Association's resources are limited to the following:

1. Funds allocated by members from their personal money for the purpose of spending on the Association to achieve its goals and objectives.
2. Membership fees and annual subscriptions of members.
3. Donations, grants, and endowments.
4. Support from the Associations Support Fund.
5. Revenue from income-generating activities and projects.
6. Bequests.

If the Association wishes to obtain a donation or funding from a non-Jordanian entity, it must notify the Council of Ministers (Cabinet) , provided that the notification specifies the source of this donation or funding, its amount, the method of receipt, the purpose for which it will be spent, and any special conditions attached to it.

### **Financial Year and Records**

According to Article 29 of the Association General Bylaw:

- a. The Association's financial year begins on January 1st and ends on December 31st of each calendar year. If the Association commences work during the second half of the year, its first financial year ends at the end of the following financial year.
- b. The Association's funds shall be deposited in the bank designated by the Administrative Board. Its accounts shall not enjoy banking secrecy against any inquiry submitted by the Assigned Minister or the Secretary-General of the Associations Register.
- c. Subject to what is stated in this Bylaw, the Administrative Board shall prepare internal instructions regulating the Association's financial matters, specifying the mechanism for withdrawing any amounts from the Association's funds deposited in the bank, the minimum limit for petty expenses, and the authority to sign bonds and other financial matters.
- d. In all cases, no amount of the Association's funds may be spent except to achieve any of its purposes, and it may not be spent otherwise.
- e. The Association shall keep organized financial records and accounts at its center in accordance with the financial principles specified for bookkeeping.



The Association shall keep a special register at its center for the members of the General Assembly and annual subscriptions, minutes of the meetings of the General Assembly and the Administrative Board, and any other technical records related to the Association's work.

- g. The Association's accounts must be audited annually by a legal auditor, provided that the audit is completed within a period not exceeding three months from the end of the Association's financial year. The Association has the right to submit a request to the Assigned Minister to exempt it from the audit if the budget is less than two thousand Dinars, in which case the financial accounts will be audited and reviewed by the Assigned Ministry.

**Exceptions for Paid Work by Working Members of the Association:** According to Article 30 of the Association General Bylaw:

Any of the working members of the Association may work for a wage in it, provided that the General Assembly approves based on a decision taken by the General Assembly by a majority of its members, including the duration of the appointment, its reasons, the nature of the work, and the salary, provided that it is commensurate with the salaries of peers in the labor market.

## Good Governance

According to Article 31 of the Association General Bylaw:

- a. The Association, in carrying out its work and activities, is keen to adopt practices, standards, systems, and instructions that enhance good governance and the rules of transparency through:
1. Applying standards and practices aimed at the Association, its members, its Administrative Board, and its employees respecting laws, regulations, and public morals, and seeking to achieve the public interest by participating in the process of community development and preventing any practices that would negatively affect the public interest.
  2. Applying standards and practices aimed at the Association, its members, its Administrative Board, and its employees adhering to the Association's Bylaw Articles, internal instructions, and policies that comply with the legislation in force in the Hashemite Kingdom of Jordan.
  3. Adopting sound behavioral standards and practices that limit the conflict of interest in financial, administrative, technical, and supplies matters, and emphasizing respect for the confidentiality of all information related to the Association and its work, provided that it does not conflict with the provisions of the enforced legislation.
  4. Adopting sound administrative systems and instructions that enable the Administrative Board to achieve oversight and supervision over the Association's work and activities, impose administrative and legal accountability, and achieve the separation of authorities and responsibilities to ensure sound control.
  5. Adopting sound financial systems and instructions that ensure continuous financial control over the Association's resources and how they are spent, and ensure the Association's adherence to the sources stipulated in this Policy.



6. Adopting systems and instructions that govern the recruitment process in the Association, based on competence and merit, and providing a suitable work environment for employees.
  7. Adopting standards that govern the process of collecting donations and grants for the Association, through which the Association seeks to build trust with donors and financing entities and gain their support.
  8. Adopting advanced standards in integrity and transparency to achieve the Association's goals and mission and implement its activities.
- b. The Association is keen to maintain the vitality and integrity of the voluntary work sector and enhance community trust in it through financial transparency and documented information. To ensure the achievement of this goal and to prevent the Association from being exploited in any illegal acts, it adheres to the following:
1. Exercising due diligence to identify the identity of the donating parties or beneficiaries of the Association's services and verifying their legal status, activities, the purpose of the working relationship with the Association, the nature of this working relationship, and the real beneficiary of the existing relationship between these persons and the Association, if any. All related data must be recorded in special registers and kept for a period of not less than five years from the date of completion of the transaction or the date of termination of the working relationship with the Association, as the case may be, and updating this data periodically.
  2. Ensuring not to deal with anonymous persons or those with fictitious or illusory names, or with fictitious banks or companies.
  3. Immediately notifying the Secretary-General of the Associations Register of any operation suspected of being related to money laundering or terrorism financing, and keeping a copy of the notification and the related documents, records, data, and information for a period of not less than five years from the date of sending the notification or until a final judicial ruling is issued regarding this operation, whichever is longer.
  4. Respecting the confidentiality of the information related to the notification submitted to the Secretary-General of the Associations Register pursuant to the provisions of Clause (3) of this paragraph and any procedures related to this notification that may be taken regarding operations suspected of being related to money laundering or terrorism financing, or any information related thereto.
  5. Keeping records to register the Association's local, regional, or international financial operations, which include sufficient data to identify these operations, and keeping these records and all related documents, data, and information for a period of not less than five years from the date of completion of the transaction or the date of termination of dealing with the Association, as the case may be, and updating this data periodically.
  6. Observing the provisions of the enforced Associations Law regarding funding from non-Jordanian entities.



Observing the obligations contained in the relevant and enforceable international resolutions and adhering to them, which are communicated to the Association by the Secretary-General of the Associations Register or the assigned authorities in this regard.

### **Response to Investigation**

The Association, in accordance with this policy – without prejudice to the laws and the rights of others – is committed to responding to the assigned authorities and those with authority and interest to verify any complaints related to suspicions of corruption or fraud within the scope of this policy or the violations contained therein. It is committed to responding to the complainant and reporting the result.

In the event that any of the employees, executors, or contractors are proven to be involved in crimes punishable by law, the President of the Association, based on legal advice, shall have the right to proceed with the complaint procedures before the competent judicial authority. Other than crimes, decisions related to employees are governed by the Internal Work System and the Code of Conduct.

### **Authority of the Investigation Committee**

The formed team for verifying the complaint shall have the following authorities – provided that their procedures do not conflict with the enforced laws and regulations:

- Hearing the statements of the accused.
- Hearing the statements of employee witnesses.
- Accessing and reviewing the Association's facilities and files.
- Seeking assistance from experts and professionals.
- Submitting the necessary recommendations and investigation results to the President.

### **Guaranteeing Confidentiality**

All information and complaints received regarding employees are treated with absolute confidentiality. The employee shall be notified of the complaint or any information received about them related to fraud, corruption, or violation of contractors' terms.

All investigation procedures are confidential and may not be disclosed or circulated among employees.

The investigation committees must conclude and submit the report to the Administrative Board within one week of their formation, and their work period may be extended for three working days.

The employee is given the opportunity to have their statements heard and to present their data. In all cases, the evidence must be preserved and not destroyed or lost by the investigation committee.

### **Effectiveness**

This policy is considered effective since its approval by the Administrative Board in its legal meeting on Saturday, 27/11/2021, and adherence to it and the implementation of its provisions are mandatory as stated herein.