Policy Against Fraud and Other Corrupt Practices

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1. TARGET GROUP

This Good Management Policy applies to all employees, interns, and volunteers of FOUR PAWS, hereafter "colleagues", as well as to all Board members and may be applied to other stakeholders depending on individual circumstances and the nature of their relationship with FOUR PAWS.

2. INTRODUCTION

FOUR PAWS is a global animal welfare organisation with offices as well as sanctuaries for rescued animals in numerous countries. Beside the local presence, FOUR PAWS works with local authorities and strategic partner organisations on the ground to support efforts with animal rescue and care, veterinary public health services, and the protection of livelihoods.

Since its founding in 1988, the organisation has grown considerably, and with this expansion, its management practices and needs evolved. Due to the organisation’s global animal welfare activities, a comprehensive approach to management which takes into account both internal management procedures, and its relations with external stakeholders is required.

The Good Management Policy intends to guide FOUR PAWS to the highest standards of management throughout its operations in order to achieve the greatest impact possible to live in a world where humans treat animals with respect, empathy and understanding.
3. GOOD MANAGEMENT PRINCIPLES

The following principles guide all management practices at FOUR PAWS.

3.1. Strategic management

FOUR PAWS aims to manage its organisation in a strategic and deliberate way, taking into consideration internal and external factors to maximize its impact.

FOUR PAWS strives to achieve a healthy organisation through the constant adaptation of a smart global structure, a unified management framework and progressive digital transformation.

FOUR PAWS seeks that resources are protected and used in an efficient manner through its unified management framework, policies and standards for operational excellence, as well as business process and project management system that considers global synergies and local specificities.

FOUR PAWS internal monitoring system aims to enable the organisation’s departments to monitor, evaluate, and report their progress systematically and regularly.

3.2. Accountability

FOUR PAWS is accountable to the animals in its care for their well-being.

FOUR PAWS is accountable to the organisation’s donors who trust that their charitable contributions are used in an efficient and transparent manner, consistent with FOUR PAWS vision and mission.

FOUR PAWS is accountable to the local authorities in the territories where FOUR PAWS has activities.

FOUR PAWS is accountable to all colleagues and its partners.

3.3. Transparency

FOUR PAWS intends to communicate openly and honestly with its colleagues, donors and society at large about the organisation’s policies, programmes, activities, and outcomes, as well as use of funds.

FOUR PAWS management reporting practices are designed to ensure that strategic and operational targets are reviewed and compared regularly with performance results. Results and findings are communicated in a transparent manner.
3.4. Integrity

FOUR PAWS is engaged to be free of any fraud, corruption and unethical practices leading to illegal or controversial practices.

FOUR PAWS aims to avoid any conflicts of interests with colleagues, ex-colleagues, partners, local authorities and donors.

3.5. Dignity and Respect

FOUR PAWS strives that colleagues, partners and donors are treated with dignity and respect, and ensures a climate of trust and mutual understanding.

FOUR PAWS does not tolerate discrimination - regardless of age, appearance, beliefs and values, civil status, culture, disability, ethnicity, faith, gender, nationality, religion, sexual orientation, or skin colour or other status -, and unfailingly respond to, or report any instances of these following internal standards.

4. GOOD MANAGEMENT PRACTICES

4.1. Programmatic Activities Management

FOUR PAWS is engaged in having the greatest possible impact on animal welfare worldwide.

Programmatic activities should be designed and planned based on their impact on animal welfare worldwide.

4.1.1. Decision

FOUR PAWS aims to approve programmatic activities in a balance between needs and resources, with the goal of maximizing the impact of the overall organisation.

4.1.2. Reporting

  Internal
Regular performance reviews against strategic objectives ought to be used to inform decision-makers.

Reviews are intended to be shared with relevant colleagues and Board members.

Reviews are aimed to be held with the participation of all FOUR PAWS entities worldwide to ensure a coordinated and strategic alignment.

  External
FOUR PAWS International provides an annual report to donors and the public. The annual report gives a comprehensive insight into FOUR PAWS work.
4.2. Management of Animals

4.2.1. Quality

FOUR PAWS places the welfare of the animal under its care as the highest priority. Animals under FOUR PAWS care are housed in sanctuaries and clinics that aim to provide the highest possible welfare standards for animals under human care. Each animal rescued by FOUR PAWS is welcomed into and kept under species-appropriate conditions in FOUR PAWS sanctuaries or partners sanctuaries.

4.2.2. Science

FOUR PAWS aims to make sure that all of its procedures, practices and standards are in accordance with the most recent and sound scientific knowledge and evidence.

4.3. Financial Management

4.3.1. Planning and budgeting

FOUR PAWS ensures safe and sound financial management to guarantee the efficiency and sustainability of its activities. Strategic planning, across all parts of FOUR PAWS, aligned with prudent and careful budgeting, is the cornerstone of the efficient use of resources.

4.3.2. Monitoring

FOUR PAWS is committed to constantly develop and implement financial monitoring tools, processes and standards within accounting to ensure accurate and reliable financial data. FOUR PAWS strives to implement standardised procedures and regular checks to prevent and correct any irregularities, error or fraud.

4.3.3. Accurate accounting

All transactions are intended to be recorded, justified and aligned with the strategic planning. Financial statements are aimed to be true, complete, consistent, audited, and to reflect the reality of the activities.

4.3.4. Stability

FOUR PAWS long term goals require long term financial stability. FOUR PAWS revenue depends on donations and may be affected by external factors. FOUR PAWS is committed to limit its exposure to financial risks on its assets.
FOUR PAWS works towards managing its financial reserves proactively in order to guarantee their financial stability, and ensures that risks are carefully analysed and mitigated.

4.4. Asset management

4.4.1. Procurement

FOUR PAWS aims to ensure that assets which are procured are needed and represent ‘fair value for money’.

FOUR PAWS is committed to develop and implement reliable procedures to safeguard from any conflict of interest during the purchase, disposal or transfer of assets.

4.4.2. Maintenance

FOUR PAWS is committed to the safeguard of all assets and to promote due care and attention to the maintenance of assets.

4.4.3. Recording

FOUR PAWS ensures the accurate financial and administrative recording of assets in accordance with the relevant local standards of Generally Accepted Accounting Principles, and to tax standards (where applicable).

4.4.4. Disposal

FOUR PAWS aims to dispose its tangible assets at the end of their lifetimes in a responsible and sustainable way.

4.5. Fundraising

4.5.1. Ethical

FOUR PAWS recognises the importance of ethical conduct and transparency in all of the organisation’s fundraising activities. FOUR PAWS aims to conduct all fundraising activities in a manner which reflect the Good Management Principles and FOUR PAWS commitment to animal welfare.

4.5.2. Truthful

FOUR PAWS intends to communicate truthfully with the public about specific fundraising needs and goals.
4.5.3. Independent

FOUR PAWS only accepts donations that are in line with its values, mission, goals and ethical and moral standards.

FOUR PAWS does not accept donations which are linked to a requirement to endorse products or services.

FOUR PAWS operations are a balance between FOUR PAWS mission, the local situation, internal standards and the consideration of donor expectations.

4.6. Corporate Engagement and Partnerships

FOUR PAWS welcomes opportunities to work together with third parties to fulfill its vision of a world in which humans treat animals with respect, empathy and understanding.

4.6.1. Neutral

Partnerships or agreements must not compromise the organisation’s independent, neutral and not-for-profit status as well as mission or values.

4.6.2. Due Diligence

FOUR PAWS frequently cooperates with partners around the world. FOUR PAWS aims only to enter into partnership or an agreement with other organisations, institutions, government bodies, or companies, if these collaborations are aligned with FOUR PAWS values, mission, and ethical and moral standards and if they contribute to FOUR PAWS strategic or operational goals. These partners are intended to act in compliance with all applicable anti-bribery and anti-corruption laws and relevant published internal standards developed by FOUR PAWS.

FOUR PAWS seeks to carefully evaluate collaborations and partnership opportunities through an assessment process before entering into any partnerships or agreements.

4.6.3. Transparent

FOUR PAWS aims to communicate openly and honestly with donors and the public about partnerships, and provides information about such partnerships and agreements to stakeholders upon request, while observing data privacy and other confidentiality requirements.
4.7. Communication Management

4.7.1. Professional

FOUR PAWS external communication is handled by authorised colleagues only. Colleagues at FOUR PAWS must be informed, competent, respectful, polite and patient, when engaging in conversations on social media on behalf of FOUR PAWS.

All colleagues who manage the organisation’s official social media platforms are committed to abide by all laws on data protection, copyright, trademarks, plagiarism, and fair use.

4.7.2. Honest

FOUR PAWS is committed to providing clear, accurate and reliable information at all times. FOUR PAWS seeks to establish close relationships with its donors, partners, local authorities and colleagues, through regular communication, integrity and transparency.

4.7.3. Two-way

FOUR PAWS believes in top-down and bottom-up communication through all levels of the organisation. Efficient two-way channels of communication ensure that colleagues at FOUR PAWS, donors and the FOUR PAWS community at large are aligned with and help FOUR PAWS to achieve its mission.

4.8. Management of People

4.8.1. Culture

FOUR PAWS aims to demonstrate equity, fairness, transparency, professionalism and a spirit of collaboration and a sense of belonging.

FOUR PAWS promotes a working culture in which colleagues acknowledge and value the contributions of others.

FOUR PAWS as an employer aims to treat colleagues fairly and equally. Any and all forms of harassment will not be tolerated.

FOUR PAWS promotes a culture of constant learning and development of colleagues.

4.8.2. Equal opportunities

FOUR PAWS strictly adheres to the principles of diversity, equity, and inclusion in all of its human resources activities, including the recruitment, hiring, training, assessment, and remuneration of all colleagues.
4.9. Data protection

FOUR PAWS data (including personal data from colleagues, donors or partners) is a valuable asset, which is essential for the strategic and operational management of the organisation.

4.9.1. Protected

FOUR PAWS diligently protects data and is committed to comply with all applicable data protection laws. Personal information is safeguarded and kept confidential.

FOUR PAWS strives to maintain the integrity of all of the organisation’s data and metadata, and takes measures to protect it from misuse or loss.

FOUR PAWS strives to have measures in place to safeguard any confidential information entrusted to the organisation by third parties from unauthorised disclosure. It is disclosed only on a need-to-know basis, if specifically authorised by third parties, or if required by law.

4.9.2. Reliable

Decisions, activities, and transactions are intended to be reliably and accurately documented.

Information and communication technology (ICT) systems and processes aim to manage, store, analyse and protect data. ICT tools ought to be constantly maintained, monitored and updated.

FOUR PAWS is strongly committed to the highest possible IT Security in order to ensure information confidentiality, availability, integrity and continuity.

4.10. Sustainability

4.10.1. Efficient

FOUR PAWS aims to reduce the organisation’s carbon footprint and improve resource efficiency. Throughout the organisation, resources are used in a sustainable and transparent manner.

FOUR PAWS is committed to regularly review and improve the organisation’s sustainability performance.

4.10.2. Ambitious

FOUR PAWS complies with and is committed to exceed all applicable legal requirements and integrates sustainability considerations into all management decisions.

FOUR PAWS strives to identify and use suppliers, partners, and collaborators who share the organisation’s values and commitment to human and animal welfare, and the
protection of the environment. FOUR PAWS encourages all stakeholders in the organisation’s value chain to adopt sustainable management practices.

5. IMPLEMENTATION

5.1. Accountability

5.1.1. Advisory Board

The Advisory Board of FOUR PAWS, through the fiduciary duties of its members, is the ultimate accountable body of the good management of FOUR PAWS.

5.1.2. Board

FOUR PAWS Board is accountable for overseeing the organisation’s good management practices.

FOUR PAWS Board is accountable for communicating strategic level standard documents globally.

5.2. Responsibility

5.2.1. Line Managers

FOUR PAWS line managers are responsible for sharing the information, ensuring the appropriate level of knowledge, understanding, commitment and compliance with the Good Management Policy of their teams.

5.2.2. Colleagues

FOUR PAWS expects all colleagues to be intricately familiar with all Policies, and to comply with the principles and internal standards defined in these policies.

6. CONSEQUENCES OF BREACHING THE GOOD MANAGEMENT POLICY

Breach of this Good Management Policy may constitute an infringement of applicable laws resulting in civil or criminal liability and may have an adverse effect on FOUR PAWS and other colleagues.

In case of non-compliance with the provisions of this Good Management Policy, FOUR PAWS will take necessary response measures and might need to take disciplinary actions, up to and including termination of contractual relationship with FOUR PAWS or, if necessary, report the incident to the relevant authorities.

Any colleague found to be involved in fraudulent and/or corrupt activities, or who has been negligent in the exercise of their supervisory duties will be subject to disciplinary
action, including potential dismissal [termination of their employment]. If warranted, FOUR PAWS will also initiate civil and/or criminal proceedings against those individuals involved.

7. REPORTING OF MISCONDUCT

Colleagues must immediately report any breach of this Good Management Policy, whether deliberate or accidental, to a line manager or other relevant function within the organisation appointed to receive such reports. Should a line manager or other relevant function within the organisation appointed to receive such reports be involved in the suspected breach of this Good Management Policy, incidents must be reported to their superior and Human Resources. Colleagues at FOUR PAWS must not prevent any other colleague or affected individual from reporting a suspected breach of this policy.

FOUR PAWS will not retaliate against colleagues who report a presumed breach of this Good Management Policy in good faith no matter the outcome. Should colleagues choose to knowingly make false allegations, FOUR PAWS may take disciplinary action. FOUR PAWS provides colleagues with instructions on how to confidentially report a suspected breach of this Policy.