



IMRO Rwanda

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IMRO RWANDA Anti-Corruption Policy

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1. Background of Ihorere Munyarwanda Organization (IMRO Rwanda)

Ihorere Munyarwanda Organization (IMRO Rwanda) is a Non-Governmental Organization that was founded in 1999 and legally operating in Rwanda. It was granted legal personality No 03/11 and have fulfilled all requirements for compliance with the new Law number 04/2012 of 17th February 2012 governing the Organization and Functioning of National Non-Governmental Organizations/RGB-Rwandan Law. IMRO Rwanda has 23 years' experience implementing interventions in the context of Poverty Alleviation, Gender Equality, Nutrition, GBV, HIV, Education, Environment, Peace Building, Health Promotion, accountability, Advocacy and Networking in order to improve lives of IMRO RWANDA Rwanda's beneficiaries at individual, family and, community levels for sustainable social economic development. This is achieved through broad consultation, partnership and transparent management with different Stakeholders. The organization works towards the vision of IMRO Rwanda as a national organization of excellence in harmonization and synergy for a healthy society, targeting Women Adolescents, Youth, Key Populations, Women with Low income and other vulnerable populations to have Access to services with Human Right based approach.

1.1 IMRO Rwanda Vision

IMRO Rwanda works towards the vision as a National Organization of excellence in harmonization and synergy for a healthy society by targeting General Population, Women, Youth, Children, Key Populations and vulnerable groups with Human Rights based approach in Rwanda and beyond.

1.2 IMRO Rwanda Mission

IMRO RWANDA's ultimate mission is to serve the general population by implementing socio-economic interventions, advocacy, and networking and by promoting sustainable socio-economic development.

1.3 Core Values

IMRO Rwanda's core values are:

- Gender Sensitive
- Good Governance
- Creativity and innovation
- Human rights based
- Self-confident and team work
- Integrity and commitment
- Time consciousness and management
- Equal opportunities and equity
- Equal opportunities and equity
- Ready to work together with interested partners
- Transparency, accountability and responsibility.

2. Introduction

IMRO Rwanda Anti-Corruption Policy represents IMRO Rwanda's commitment under IMRO Rwanda's regulations to attain good governance through preventing and fighting all forms of corruption. It is based on the staff, and the management commitment to building a culture of justice and fairness. IMRO Rwanda is establishing an environment where integrity is valued and corruption and its related offenses are abhorred and rejected. IMRO Rwanda Anti-Corruption Policy aims at supporting national development by inculcating right morals into people that are under the care of IMRO Rwanda, and who are the agents of change in society. IMRO Rwanda will build a strong base of ethical future

leaders who will be able to sustain a better quality of life for the people of Rwanda and establish a strong effective and efficient state that is corruption free. IMRO Rwanda will demonstrate justice and fairness in and through the work of its staff, and those who engage in corrupt practices will not have a place in IMRO Rwanda. IMRO Rwanda Anti-Corruption Policy will contribute to the achievement of public service that embraces integrity, upholds transparency and accountability, and ensures full compliance with regulatory and legal frameworks.

2.1 Definition

Corruption refers to:

A) Any act of abuse of a position, power or honor one enjoys within a state organ, in a public or private institution, in a foreign company or international organization working in the country, or power conferred by any other function which is used contrary to the law. By giving to oneself, giving others or requiring an illegal benefit of a service or contrary to the law;

B) Any act leading to the accumulation of property without legal justification;

C) Using a person with position, power or honor mentioned under item (a) of this schedule, in order to benefit from an illegal advantage or a service contrary to the law;

D) Giving or agreeing to give a gift in cash or any other illegal benefit, for the provision of a service or act in unlawful way or to reward the provider of the service or act rendered, either by the recipient or an intermediary.

2.3 Scope/Applicability

This policy applies to IMRO Rwanda Management, staff and outsourced service providers of the organization.

3. Purpose of this Policy

IMRO Rwanda is committed to conducting its work fairly, honestly and openly, to the highest standards of integrity, and accordance with all national legal requirements. The purpose of this policy is:

- ❖ To provide a clear statement that IMRO Rwanda will not tolerate any form of corruption and other related offences.
- ❖ To emphasize the IMRO Rwanda's commitment to prevent employees, staff or other persons associated with IMRO Rwanda from engaging in corruption and other related offences and to deal with this should it occur.
- ❖ To adopt strategies of preventing corruption and related offenses in IMRO Rwanda.
- ❖ To set out review and monitoring procedures to ensure compliance with this policy.

4. Policy Statement

This policy is a determination of IMRO Rwanda's management commitment to Zero tolerance for corruption. Furthermore, IMRO Rwanda is committed to creating a work environment free from any form. Discrimination, dehumanization, intolerance and genocide ideology which are also other forms of corruption.

Recognizing the benefits of fighting corruption, IMRO Rwanda management accepts the responsibility of spearheading the fight in a decisive, sustainable and all-inclusive manner and with the involvement of all stakeholders. All activities of IMRO Rwanda will be guided by the IMRO Rwanda Anti- Corruption Policy.

5. Legal Framework

MRO Rwanda's Anti-Corruption Policy is governed by the following legal texts:

- Constitution of the Republic of Rwanda.

- Organic law instituting the penal code.
- Organic Law on leadership code of conduct.
- Law on Prevention, suppression and punishment of corrupt and related offences.
- Law on protection of whistle-blowers.

6. Strategies to prevent and fight corruption at IMRO

Rwanda

IMRO Rwanda recognizes that corruption and related offences damage the social and institutional fabric of the country, and this is why IMRO Rwanda is committed to prevent and fight corruption and any other related offences. The strategies that IMRO elaborated to prevent and fight corruption are:

6.1 Training and Awareness

IMRO Rwanda commits itself to continuous training of staff in matter of ethics and integrity. To this end, IMRO Rwanda will annually support civic education activities including National Service activities to embed the culture of integrity.

6.2 Criminal and Disciplinary Measures

Staff members, and other outsourced service providers who violate this Policy will face criminal and administrative actions as provided for by the applicable laws, rules and regulations, and contract terms as the case may be.

6.3 Protection of Whistleblowers

IMRO Rwanda, will in accordance with the law No.35/2012 relating to the protection of whistle blowers, make sure that the whistle blowers who report corruption cases are managed with the utmost confidentiality and protection and do not suffer from any disadvantage as a result of reporting wrong doers.

6.4 Assets Declaration

IMRO Rwanda will make sure that staff that have to declare assets will respect their legal obligations in a timely manner.

6.5 Specific Rules covering accepting bribes/gifts

IMRO Rwanda prohibits the following;

Prohibited Gifts/Bribes: This could include cash, valuable items, or any gift that could be seen as an attempt to influence or gain favor.

Reporting Mechanisms: IMRO Rwanda Encourages whistleblowing and ensures that reports are handled confidentially and without fear of retaliation.

Handling Reported Incidents: IMRO Rwanda's established internal rules to deal with this. This includes disciplinary actions for staff involved in such incidents.

Gift Policy: For the limit of the value of gifts that can be accepted and those that require staff to report any gifts received refer to internal rules.

Training and Awareness: IMRO Rwanda staff members are educated about the policy, including the rules regarding gifts and bribes. Training help employees recognize and respond to potential bribery attempts.

Consequences: Clearly state the consequences for staff members found guilty of accepting bribes or inappropriate gifts. This may include disciplinary actions, legal consequences, or termination of employment.

7. Structure for Fighting Corruption

IMRO Rwanda is committed to constitute and empower the IMRO Rwanda corruption prevention committee chaired by the Executive

Director toward Zero Tolerance on any corruption incidence within the organization.

IMRO Rwanda will set up mechanisms to allow the organization stakeholders to pin point corruption and other related cases. To this end, all the IMRO Rwanda stakeholders who encounter a corruption case will be encouraged to speak with or write anonymously to IMRO Rwanda Executive Director as soon as they possibly can.

7.1 Example of Corruption and Related Offenses and Risky Areas at IMRO Rwanda

As far as procurement is concerned, corruption may arise in appointing preferred suppliers, contractors and agents or any by passing criteria, falsifying deliveries, fraud in public tendering and purchase of unnecessary goods.

7.2 Composition of Anti-Corruption Committee

The IMRO Rwanda Central Anti-Corruption Committee shall be established and it shall comprise the following:

1. IMRO Rwanda Executive Director
2. IMRO Rwanda Human Resource Manager
3. IMRO Rwanda Legal Advisor
4. IMRO Rwanda Staff Representative.

7.3 Mandate and operations of the committee

- a) Spearheading anti-corruption campaigns within the organization
- b) Setting priorities in the prevention of corruption within the organization

- c) Coordinating corruption prevention strategies
- d) Integrating all corruption prevention initiatives in the organization
- e) Receiving and reviewing reports on corruption prevention initiatives and recommend appropriate action
- f) Receiving and taking action on corruption reports made by staff, and other stakeholders
- g) Monitoring and evaluating the impact of corruption prevention initiatives
- h) Promote research on corruption
- i) Receiving and taking action on report on information of corruption gathered in information boxes
- j) Meeting on quarterly basis and when necessary.

7.4 Internal Audit Reviews

The Executive Director and the designated Anti-Corruption Committee members will be at the forefront of corruption prevention through control environment, risk assessment, control of activities, information and communication (free and open communication throughout the organization) and monitoring (assessing the quality of the internal control system over time). The internal Auditor's reports on corruption are submitted to the Executive Director.

7.5 How to Report Corruption Internally and Externally

All forms of communication are encouraged including; the use of telephone, email, suggestion box or verbal communication. Stakeholders can also report anonymously.

To this end, IMRO Rwanda's Central Corruption Committee will avail the telephone number and e-mail for this purpose. The organization will also provide toll free numbers to facilitate reporting of any form of corruption. Confidentiality is of paramount importance.

7.6 Handling Corruption Cases

Prior to taking action in any case of alleged corruption and related offences, the committee must first gather evidence and take into consideration the existing Institution policies and the laws of the Republic of Rwanda. This will avoid victimization of the staff members. And the organizations stakeholders spuriously accused of engaging or being involved in corrupt activities.

7.7 Management/Implementation Authority

The IMRO Rwanda team is responsible for the implementation of this Policy. Specifically, IMRO Rwanda staff and the Anti-Corruption Committee will take the lead to ensure the implementation and positive impact of this policy.

8. Operational Procedures

8.1 Strategies to Fight Corruption at IMRO Rwanda

Strategy	Action	Key Activities	Responsibility
Strengthen Capacity of staff to resist and report corruption.	Increase Awareness	-Training and sensitization of staff members. -Initiate awarding to recognize and encourage Exemplary Character. -Organize regular dialogues and conferences.	Executive Director and outsourced experienced personnel.
Initiate a strong institutional and legal framework within the institution	Improve internal control system	-Adopt corruption reporting guidelines. -strengthening Control mechanisms to prevent cheating. -Elaborate	Anti-Corruption Committee

		internal rules and regulations.	
Initiate a corruption reporting system		-Provide a toll-free number. -Put in place mechanisms to protect whistleblowers. -Establish corruption reporting boxes.	-Executive Director.
Minimizing risks of Corruption	-Promote E-Systems and ensure effective management of staff.	-Implementing E-Payment and E-Procurement systems effectively. -Job rotation	-Executive Director, Finance Manager & Human Resources.

8.2 Review

The policy shall be subject to review by the entire organization Management every 2 years (24 months) or more frequently as the management may determine.

Approved by;

Aimable MWANANAWE

IMRO Rwanda Executive Director



Flavienne NDAYISHIMIYE

Legal Representative