



Anti-Corruption Policy and Procedures

Version	Date	Author	Approved
V.1	April 2018	M. Hughes	L. Hassler
V.2	November 2021	W. Hassler-Forest	L. Hassler
V.3	December 2022	I. Modugno	W. Hassler-Forest

TABLE OF CONTENTS

Introduction	3
Scope	3
Definitions	3
What is bribery?	3
Gifts & Hospitality	4
Record-keeping	4
Sanctions	4
Report an integrity incident or concern	5
Integrity reporting system	6
1. Management	6
2. Integrity Officer	7
3. External Safeguarding & Wellbeing Liaison	7
Template: Report a concern, incident, or violation	8

ANTI-CORRUPTION POLICY AND PROCEDURES

Introduction

It is Musicians Without Borders' policy to conduct all of our work in an honest and accountable manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting **professionally, fairly** and with **integrity**. Our Code of Conduct promotes honest and ethical behavior throughout the organization, as well as provides a mechanism to report unethical conduct.

Scope

The policy is implemented by MWB's head office in Amsterdam, under the direction of MWB Director Laura Hassler (laura@mwb.ngo). This policy applies to all legal and natural persons working for us or on our behalf in any capacity, including employees at all levels, volunteers, interns, contractors, external consultants, third-party representatives, partner organizations and business partners.

Definitions

- Gift:** An item, sum of money, voucher, goods or services given willingly to someone without payment; a present.
- Hospitality:** The act of hosting or being hosted without compensation, e.g. at a restaurant or hotel.
- Service tip:** A sum of money given by a customer to certain service sector workers such as hospitality for the service they have performed, in addition to the basic price of the service.

What is bribery?

Bribery means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. Bribery includes offering, promising, giving, accepting or seeking a bribe. Specifically, you must not:

- 1) give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;

- 2) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else; or
- 3) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
- 4) threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

Gifts & Hospitality

This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining MWB's image or reputation, or promoting our work. A gift, hospitality or service tip will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process). Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not be given in secret. Gifts must be given in the name of MWB – not your own name. Promotional gifts of low value such as MWB merchandise may be given to our existing suppliers and business partners and we can accept equivalent gifts from them.

Gifts with a value exceeding EUR 50 cannot be accepted.

Record-keeping

You must keep a written record of all hospitality, gifts or service tips with a value exceeding EUR 25 given or received and declare these to the MWB Finance Manager.

Sanctions

Any legal or natural person working for us or on our behalf in any capacity, as defined under "Scope" above, who breaches this policy may be excluded from activities on behalf of MWB or may face disciplinary actions up to but not limited to termination of their employment, service or partnership agreement. Where appropriate, a breach of this policy may be reported to the competent authorities. MWB reserves the right to recover any damages resulting from the breach from the party who committed the breach.

REPORT AN INTEGRITY INCIDENT OR CONCERN

All concerns or allegations relating to a violation of Musicians Without Borders integrity policy will be handled quickly and with sensitivity.

For the present purposes, “Musicians Without Borders integrity policy” will include the following policy documents and codes:

- MWB Code of Conduct,
- MWB Safeguarding Policy and Procedures,
- MWB Anti-Bullying and Harassment Policy and Procedures,
- MWB Anti-Corruption Policy,
- Any integrity policy documents to be formally adopted by Musicians Without Borders in the future.

Musicians Without Borders offers the following channels below through which you can speak up. You are encouraged to speak up as soon as you can, even if you might not have all the facts related to your concern. There is no need to further investigate the matter yourself - you are not required to gather evidence to build a case. Please note that MWB representatives are obliged to speak up as soon as reasonably possible.

Musicians Without Borders will take all referrals and concerns seriously. We will listen to and support the victim and/or the person reporting the abuse or violation.

Note: Any decisions made must consider the culture we are working in when deciding what actions to take, as there may be no legal mechanism in place to handle certain referrals and inappropriate actions could potentially further endanger the victim. We will act appropriately, with the fullest consideration of the best interests of the person and on the basis of expert advice in all cases, regardless who an allegation involves.

INTEGRITY REPORTING SYSTEM

Musicians Without Borders has the following reporting channels:

1. Management (not anonymous),
2. Integrity Officer (possible to stay anonymous),
3. External Safeguarding & Wellbeing Liaison (possible to stay anonymous).

MWB's Safeguarding and Integrity Page can be accessed via the following link: mwb.to/safeguarding&integrity

1. Management

To report a violation or concern to Musicians Without Borders management, you can contact your line manager, the finance manager, the director, or if the violation or concern pertains to an MWB program, the program manager.

Refer the violation or concern as soon as possible, and do not discuss the details with anyone who does not need to know.

Contact details - Office		
Director	Laura Hassler	Mobile: +31 65 126 9439 Email: laura@mwb.ngo
Program Development Manager	Chris Nicholson	Mobile: +31 6 211 27 289 Email: chris@mwb.ngo
Strategic Development Manager	Wendy Hassler-Forest	Mobile: +31 621 856 882 Email: wendy@mwb.ngo
Finance Manager	Ilaria Modugno	Mobile: +31 6 844 32 994 Email: ilaria@mwb.ngo
Contact details - Programs		
Middle East	Fabienne van Eck, Program Manager	Mobile: +972 547 220 926 Email: fabienne@mwb.ngo
Rwanda / Democratic Republic of Congo	Chris Nicholson, Program Manager	Mobile: +31 6 211 27 289 Email: chris@mwb.ngo
Music Connects (Kosovo, North Macedonia, and EU-based partners)	Wendy Hassler-Forest, Program Manager	Mobile: +31 621 856 882 Email: wendy@mwb.ngo
Latin America	Miguel Ortega, Program Manager	Mobile: +31 618 471 750 Email: miguel@mwb.ngo
Welcome Notes / Training Programs	Chris Nicholson (ad interim), Training Coordinator	Mobile: +31 6 211 27 289 Email: chris@mwb.ngo

Any incidents that the line manager or program manager believes require further inquiry will be reported to MWB's Integrity Officer (below) or MWB's Director, and where relevant to the safeguarding lead at the partner organization.

Once a concern, incident or violation has been reported, the reporting person or where appropriate the person receiving the report should follow up by completing [this form](#).

2. Integrity Officer

To report a violation or concern to Musicians Without Borders' Integrity Officer, please file a report using [this reporting form](#), or contact:

Ilaria Modugno
Mobile: +31 68 443 2994
Email: ilaria@mwb.ngo

Out-of-hours:

Laura Hassler, MWB Director
Mobile: +31 65 126 9439
Email: laura@mwb.ngo

Reports will be handled as quickly as possible. The Integrity Officer will record the details of your report, make a first assessment and decide with you on the appropriate response and referral.

If you use the reporting form, reports can be filed anonymously. Reports can be written in your own language and can be filed 365 days a year. Please note that, when filing an anonymous report, options for following up on your report and keeping you informed may be limited.

3. External Safeguarding & Wellbeing Liaison

If you would rather raise a concern or file a report through a **confidential external channel**, you can file a report with independent service provider [Darren Abrahams](#), External Safeguarding & Wellbeing Liaison, using [this reporting form](#).

Reports will be handled as quickly as possible. Where possible and appropriate, the External Safeguarding and Wellbeing Liaison will inform the reporter of actions taken in response to the report.

Reports can be filed here anonymously, and can be written in your own language and filed 365 days a year. Please note that, when filing an anonymous report, options for following up on your report and keeping you informed may be limited.

TEMPLATE: REPORT A CONCERN, INCIDENT, OR VIOLATION

Musicians Without Borders strives to uphold the highest standards of integrity and safety in its work. We take concerns brought to our attention seriously.

Would you like to report a concern, incident or violation of Musicians Without Borders' policies or Code of Conduct? Please fill out this reporting form.

Date of report:

When did the concern arise or the incident or violation take place?

How did the information reported reach you (e.g., witnessed or observed, informed by the survivor, informed by a third party)?

Please describe the concern, incident or violation and any individual/s involved.

Was any immediate action taken to ensure safety or treatment of those affected? If so, please describe.

Next steps requested or suggested:

Do you wish to remain anonymous? Please be aware that our ability to respond to an anonymous concern may be limited or not possible if the disclosure of identity is necessary to facilitate an investigation of the concern.

- Yes
- No

Completed by:

Name:

Email address:

Signature:

Telephone Number: