

Anti-Corruption and Anti-Money Laundering Policy

Stichting Global Nutrition Initiative Europe

1. Purpose and Scope

This policy establishes GNI Europe's commitment to the highest standards of integrity, transparency, and accountability in all operations. It sets out the principles and procedures to prevent, detect, and address corruption, bribery, fraud, money laundering, terrorist financing, and other forms of financial misconduct.

The policy applies to:

- Members of the Board of Directors (bestuurders)
- Employees and consultants under contract
- Volunteers and interns
- Partner organizations, suppliers, and service providers engaged by GNI Europe

2. Legal and Organizational Framework

GNI Europe is registered as a stichting (foundation) under Dutch law. As such, it is required to comply with:

- The Dutch Civil Code provisions governing stichtingen
- Dutch and EU anti-corruption and anti-money laundering regulations
- Standards for public benefit organizations (ANBI) where applicable
- GNI Global principles and governance standards

All financial flows must align with GNI Europe's Policy Plan and Remuneration Policy, ensuring that funds are exclusively directed to achieving the foundation's mission of hunger alleviation and related objectives

3. Guiding Principles

1. **Zero Tolerance:** GNI Europe strictly prohibits all forms of corruption, bribery, fraud, facilitation payments, and money laundering.
2. **Transparency:** All financial transactions must be accurately recorded, documented, and reported.
3. **Accountability:** Funds are used solely to support GNI Europe's objectives; personal benefit or unauthorized use of assets is prohibited.

4. Due Diligence: GNI Europe conducts appropriate checks on donors, partners, suppliers, and contractors to ensure integrity and compliance.
5. Board Oversight: The Board of Directors reviews and approves financial flows, contracts, and partnerships to safeguard compliance.

4. Anti-Corruption Standards

- Prohibition of bribes and undue advantages: No employee, board member, or partner may offer, solicit, or accept any form of bribe, kickback, or improper advantage in connection with GNI Europe's work.
- Gifts and hospitality: Modest and customary hospitality may be accepted if it does not influence decision-making. Any gift or benefit exceeding €50 must be declared to the Board.
- Conflict of interest: Board members, staff, and volunteers must disclose potential conflicts of interest. Decisions must be made solely in the best interest of the foundation and its mission.
- Whistleblowing: Any suspected misconduct may be reported confidentially to the Board. Retaliation against whistleblowers is prohibited.

5. Anti-Money Laundering (AML) Standards

- Know Your Donor (KYD): GNI Europe screens donors, ensuring funds are from legitimate sources and not linked to criminal activity or terrorist financing.
- Know Your Partner (KYP): Partner NGOs, suppliers, and contractors are vetted for integrity, compliance with laws, and alignment with GNI's mission.
- Cash handling: Cash donations are discouraged. Where accepted, they must be logged, receipted, and deposited into GNI Europe's bank account without delay.
- Record keeping: GNI Europe maintains accurate and complete financial records, including donor agreements, receipts, invoices, and contracts, for the legally required retention period.
- Monitoring and reporting: Suspicious transactions will be promptly reported to the appropriate Dutch authorities in compliance with AML regulations.

6. Governance and Oversight

- The Board of Directors ensures this policy is implemented, reviewed, and updated regularly.
- The CEO Europe is responsible for operational enforcement, staff training, and monitoring compliance.

- Annual reports include disclosure of compliance with anti-corruption and AML principles, ensuring accountability to donors, regulators, and stakeholders.

7. Training and Awareness

- Staff, board members, and volunteers will receive periodic training on anti-corruption and AML obligations.
- Contractors and partners will be informed of GNI Europe's zero-tolerance approach as part of contractual agreements.

8. Review and Compliance

This policy will be reviewed every two years, or earlier if required by changes in Dutch or EU law, and approved by the Board of Stichting GNI Europe.