



# Novi Anti-Corruption Policy

## Stewardship and Integrity

Novi stewards resources entrusted to us for the benefit of children and communities affected by war. We are committed to transparency, accountability, and ethical action in every environment, including high-risk and conflict settings.

We do not accept corruption as a cost of doing our work.

## Policy Statement

Novi conducts all work with honesty, integrity, and accountability. We take a zero-tolerance approach to bribery and corruption and expect all staff and volunteers to uphold this standard in every context.

This policy applies to all employees, contractors, and volunteers. Violations may result in disciplinary action, including dismissal.

## Definition of Bribery

Bribery is offering, giving, receiving, or soliciting anything of value to influence a decision improperly or gain an unfair advantage.

This includes money, gifts, services, favors, contracts, or any other benefit.

Bribery includes:

- Offering or giving a benefit to gain advantage
- Accepting a benefit in exchange for preferential treatment
- Facilitation payments intended to speed up routine processes
- Any action that breaches trust or violates ethical standards

If there is uncertainty about whether an action constitutes bribery, it must be raised with leadership.

## Prohibited Conduct

You must not:

- Offer or give any payment, gift, or benefit to secure improper advantage
- Accept anything of value intended to influence decisions
- Make facilitation payments to officials or authorities
- Conceal, falsify, or misrepresent financial transactions
- Retaliate against anyone who refuses to engage in bribery or who raises concerns

## **Gifts and Hospitality**

Reasonable and appropriate hospitality is permitted when it serves a legitimate purpose such as relationship building or representing Novi.

Gifts must:

- Be modest and appropriate to the context
- Never be cash or cash equivalents
- Be transparent and not given in secret
- Be given in the name of Novi, not individuals

Any gift or hospitality that could be perceived as influencing a decision is not acceptable.

## **Record Keeping**

All financial activity must be accurate, complete, and transparent.

- All gifts and hospitality must be declared and recorded
- Expense claims must follow Novi financial procedures
- All accounts and records must reflect transactions truthfully
- No off-book accounts or hidden transactions are permitted

## **Operating in High-Risk and Conflict Environments**

Novi works in areas where governments may be unstable, absent, or contested, and where armed groups or informal authorities may control access to communities, transportation routes, or essential services.

Our commitment to integrity does not change in these environments. We do not engage in bribery or corruption, and we do not provide payments or benefits to gain improper advantage or influence.

At times, staff may face situations where refusal to comply with demands could result in immediate risk to personal safety, the safety of others, or the ability to deliver essential humanitarian aid.

In such rare and exceptional circumstances:

- The safety of staff and beneficiaries is the first priority
- Any action taken must be limited to what is necessary to protect life or enable critical humanitarian work
- Actions must not be intended to gain advantage, influence decisions, or create ongoing benefit for individuals or groups
- Such situations must remain exceptional and must not become routine practice

All such incidents must be:

- Reported as soon as it is safe to do so
- Fully documented, including the context, nature of the demand, and rationale for the decision

- Reviewed by senior leadership to ensure accountability and to strengthen future risk mitigation

Novi is committed to continually strengthening systems, partnerships, and operational strategies that reduce exposure to these situations.

### **Reporting Concerns**

Any suspected bribery, corruption, or breach of this policy must be reported to a manager or senior leader as soon as possible.

If appropriate, concerns may also be raised through Novi's whistleblower channels.

No one will face retaliation for raising concerns in good faith.

### **Accountability**

All staff and volunteers are responsible for upholding this policy. Leadership is responsible for ensuring it is understood, applied, and enforced.

Failure to comply may result in disciplinary action, up to and including termination.