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APPROVED BY THE BOARD 3 NOVEMBER - 2025

# Danish Red Cross Anti-corruption Policy

## 1. INTRODUCTION AND GUIDING PRINCIPLES

The Danish Red Cross operates under the fundamental principles of the Red Cross – Red Crescent Movement: Humanity, Impartiality, Neutrality, Independence, Voluntary Service, Unity, and Universality. These principles are foundational to the Red Cross and our vision is to always be present and act on humanitarian needs.

Corruption is potentially a serious threat to our accountability to the communities where we work and those entrusting their financial contributions to Danish Red Cross. Corruption undermines our credibility as an organisation and deprives vulnerable individuals – those affected by disasters and crises – of critical resources necessary for delivering assistance and saving lives. The prevention and eradication of corruption is therefore a priority.

By adhering to this policy, we contribute to the trust necessary for the Danish Red Cross in Denmark to carry out our work.

### 1.1 What is Corruption?

The Danish Red Cross definition of corruption is: **“The misuse of entrusted power for private gain”**

*Private* refers broadly to any personal or non-public interest, including those of an individual person, a group of people, a business, an association, or any other natural or legal persons. *Gain* covers any advantage, including financial, material or intangible benefits.

This definition corresponds to the concept of corruption in the Danish Penal Code and international anti-corruption laws.

Corruption is often known in the form of abuse of power, bribery, conflicts of interest, fraud, embezzlement or extortion. Corruption can also be experienced as misuse/abuse of power, nepotism, favouritism, embezzlement, extortion, sextortion and fraud. (Definitions follow in Appendix 1).

Corruption does not exclusively involve money changing hands; it may also include providing services to gain advantages, such as favourable treatment, special protection, extra services or favours, fast-tracking of procedures, or quicker case processing.

While those individuals who commit corruption may not necessarily benefit financially, they cause unacceptable risks of financial or reputational damage to the Danish Red Cross, which equally undermines the integrity and accountability of the organisation.

### 1.2 Danish Red Cross Commitments

Danish Red Cross are committed to high ethical standards, transparency, and accountability to all stakeholders we are working with.

We take a zero-tolerance approach to any forms of corruption. Danish Red Cross will react promptly and effectively toward reports on potential corruption. We seek to foster a work culture where everyone feels secure and empowered to report concerns of potential corruption. This means that Danish Red Cross prohibits retaliation against those who speak up against violations of this policy and

our Code of Conduct. Danish Red Cross employees adhere to Code of Conduct for staff and Danish Red Cross volunteers adhere to Code of Conduct for volunteers in Denmark (*Røde Kors-aftale*). The Danish Red Cross will also ensure that care and support is always made available to people reporting concerns and those affected, including whistleblowers and survivors of corruption and exploitation, harassment, and abuse.

## 2. PURPOSE AND SCOPE

This Anti-Corruption Policy sets a framework for fostering a culture of accountability in preventing and managing corruption within the activities and programmes of the Danish Red Cross. It defines what the Danish Red Cross considers fraud and corruption, sets expectations for ethical and accountable behavior at both personal and organisational levels, and offers clear channels for reporting possible corrupt practices.

This policy applies to all employees, volunteers and other persons associated with the Danish Red Cross. Examples of other persons associated with the Danish Red Cross include, but are not limited to: consultants; board members; employees seconded to or borrowed from another Red Cross society, the IFRC, or the ICRC; and national employees at country and regional offices around the world. Hereinafter collectively referred to as 'employees, volunteers and other persons associated with the Danish Red Cross.'

Finally, anyone (including third parties) can report suspected misconduct by employees, volunteers and other persons associated with the Danish Red Cross, or any fraud or corruption related to activities, projects and programs funded by Danish Red Cross.

## 3. RESPONSIBILITIES

Employees, volunteers and other persons associated with the Danish Red Cross are responsible for co-creating a culture in which corruption and fraud are not tolerated.

### 3.1 Leadership and Managerial Responsibilities

Managers at all levels of Danish Red Cross, both volunteers and employees, are responsible for ensuring that their employees and volunteers are informed about the Danish Red Cross' policy and principles regarding corruption. Managers will lead by example and have awareness that their behavior has a particular impact on the reputation of the Danish Red Cross.

The Executive Board has overall responsibility for setting the direction in this area, while the Secretary General is responsible for the operational implementation of the policy.

The specific responsibility for supporting prevention and ensuring appropriate handling in relation to potential violations of this policy is further elaborated and integrated into procedures and guidelines.

### 3.2 Shared Responsibility

All employees, volunteers and other persons associated with the Danish Red Cross agree to the following:

1. We will avoid any conflict – real, potential, or perceived – between our personal interests and the interests of the Danish Red Cross in Denmark and abroad, and the Red Cross Red Crescent Movement fundamental principles.
2. We will not give or accept bribery in any form; we will not solicit, expect, or invite any payment, services or other forms of compensation in return for help and support from Danish Red Cross.
3. We will not for private purposes seek to influence any person or body by using our official position or by using force or threats.
4. We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.
5. We will not misappropriate or otherwise divert property or funds entrusted to us.
6. We will not give, solicit or receive directly or indirectly any gift, such as but not limited to advantages, heritage or money that may, or be perceived to, influence the exercise of our function, performance of duty or judgement. We will continue to accept ordinary hospitality and small gifts that are symbolic, occasional, of modest value and cannot be perceived as an attempt to influence the decisions or actions of the Danish Red Cross.
7. We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, services, or other situations.
8. We will not abuse our authority or use our position to pressure, coerce, or demand sexual favours in exchange for something, like a benefit or advantage.
9. We will report any evidence or suspicion of prohibited conduct or a breach of our accountability to this policy.

If you have any doubts or questions regarding the above, please consult your manager or HR.

## 4. REPORTING BREACHES OF THIS POLICY

Employees, volunteers and other persons associated with the Danish Red Cross have a duty to report a possible breach of this Policy. At the same time, it is important to note that it is not a personal responsibility to investigate or confirm a possible breach before reporting.

Reports can be made through a variety of channels, including:

- Line manager
- Human Resources
- Email: [rappport@rodekors.dk](mailto:rappport@rodekors.dk) (received by the Chief Legal Counsel of the Danish Red Cross)
- Danish Red Cross whistleblower portal

If a line manager or human resources become aware of allegations, they shall file a report through the whistleblower portal or email to [rappport@rodekors.dk](mailto:rappport@rodekors.dk) without undue delay.

### 4.1 Confidentiality

Anyone involved in receiving and handling reports of alleged breaches of this Policy has a duty to maintain strict confidentiality of the process. Information reported or uncovered through the investigation process will therefore only be shared on a legitimate need-to-know basis.

## 4.2 Anonymous Reporting

Anonymous reports of prohibited conduct under this Policy, can be made to the [Danish Red Cross Whistleblower Portal](#), as they are received by an independent external law firm.

The Whistleblower Scheme is governed by the Danish Red Cross Whistleblower Policy, which covers protection from retaliation, confidentiality, and more. The whistleblower policy can be found via the link above.

## 4.3 Danish Red Cross Response and Handling of Reports of Alleged Prohibited Conduct

The response and handling of reports of alleged prohibited conduct is currently governed by internal DRC guidelines, hereunder:

- Procedure for handling complaints in Danish Red Cross
- Procedure for handling reports received via Danish Red Cross whistleblower scheme
- Guideline for Preventing Corruption in the International Operations of Danish Red Cross

## APPENDIX 1: DEFINITIONS OF TYPES OF CORRUPTION

The following definitions cover all forms of corruption that the Danish Red Cross does not tolerate. The list is not exhaustive, but contains common forms of corruption.

**Abuse of power:** Abuse of power is the inappropriate use of power or authority against another person. This is particularly serious when an individual uses, or has the potential to use, their influence, power, or authority to improperly affect another person's career or employment conditions, such as allocation of work, contract renewal, or promotion. Abuse of power may include intimidation, direct or indirect threats, coercion, or extortion.

**Bribery:** the act of offering, giving (active bribery), receiving, soliciting or accepting (passive bribery) something of value with the purpose of influencing the action of someone in the performance of his or her duties. Bribery is also called, for instance, "facilitation payment", "grease payment", "processing fees" etc. Bribery includes money, gifts and other favours that may influence the exercise of functions, performance of duty or otherwise harm the Danish Red Cross.

**Gifts as bribery:** In the context of corruption, a gift is a financial or other benefit, offered, given, solicited, or received in the expectation of receiving a benefit in return. Gifts include, but are not limited to, cash, material things, services, hospitality such as hotels, travels, and entertainment or favours.

**Conflicts of interest:** occur when a person who is in a position of trust has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of their position objectively. This may involve competing personal, familial, financial or professional interests. Even if no wrongdoing happens, the mere appearance of a conflict can be problematic. Examples include favouritism, nepotism, or giving unfair advantages based on personal relationships. Conflicts of interest can be potential, perceived, or real, and exists even if no unethical or improper act results.

**Nepotism:** occurs when someone in power misuses their authority to give or offer special treatment, jobs, contracts, or opportunities to friends and relatives (including spouses, parents, children, siblings, grandparents, grandchildren, and even the relatives of a spouse or partner) based on the close personal relationship without regard to merit or a professional and objective assessment of their skills or qualifications.

**Favouritism:** using or abusing one's authority to favour friends, colleagues and associates, or groups of people, because of private or professional affiliations or connections. It usually involves the distribution of resources or allocation of employment positions, or contracts, regardless of their objective qualifications.

**Embezzlement:** is understood as the misappropriation or other diversion of funds and assets (such as computers, phones, cars, etc.) for other purposes than the one stated, including negligent or improper maintenance of such assets.

**Extortion:** is the use or abuse their authority through coercion - whether direct or indirect threats, pressure, or intimidation - to demand unmerited cooperation or compensation (money, property, sex, etc.). It is a form of corruption and can include threats of harm, false accusations, or exposing embarrassing information to get what they want.

**Sextortion:** is a form of corruption (extortion, bribery, fraud) and sexual exploitation, abuse, and harassment where sex is the currency of the abuse of authority and power for private gain. Sextortion happens when someone in a position of power abuses their authority to demand sexual favours in

exchange for something, like a benefit or advantage. Instead of using physical force, they rely on their position to pressure or coerce another person.

**Fraud:** any wilful act or omission that uses deception with the intention of obtaining an undue material benefit or moral advantage; avoiding moral, contractual, or legal obligations; or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behaviour, practising trickery or acting under false pretences. Fraud may result in a loss and/or the perpetrator achieving a private gain for themselves or others but does not necessarily imply financial gain.