



Anti-Corruption and Whistleblower Protection Policy of EMMK

1. Policy Purpose

This policy establishes a systematic and effective framework to prevent, detect, and address fraud, corruption, and other malpractice in all activities of the European Movement in the Republic of North Macedonia (hereinafter: EMMK). The policy aims to safeguard the organization's integrity and ensure transparency, ethical conduct, and accountability in all its operations.

2. Core Principles

- **Zero Tolerance for Corruption:** EMMK maintains a strict zero-tolerance stance towards all forms of fraud, corruption, bribery, and illegal activities, regardless of their scale or perceived benefit to the organization.
- **Transparency and Accountability:** All internal processes, especially those related to finances and procurement, shall be documented and subject to internal and external audits to ensure a high level of transparency.
- **Whistleblower Protection:** EMMK is committed to protecting any person who reports concerns or suspected wrongdoing in good faith from any form of retaliation, harassment, or discriminatory treatment.
- **Integrity and Ethical Conduct:** All employees, management, and board members are obligated to act according to the highest ethical standards, avoid any conflicts of interest, and uphold professionalism in all their duties.

3. Roles and Responsibilities

- **Executive Director and Managing Bodies:** Are responsible for the implementation, enforcement, and promotion of this policy. They must foster an organizational culture that respects ethical standards and ensure that adequate resources are allocated for its effectiveness.
- **All Employees:** Every employee and associate of EMMK is obligated to adhere to this policy. They have a duty to report any known or suspected violations of this policy, the law, or EMMK's ethical codes through the designated channels.
- **Training and Awareness:** EMMK will provide regular, mandatory training for all employees and managers to ensure awareness and understanding of this policy, including how to identify risks and the procedures for reporting.

4. Reporting Procedures

- **Reporting Channels:** Individuals can report concerns confidentially through the following channels:
 - **Primary Channel:** Directly to their supervisor or the Executive Director.



- **Anonymous Reporting:** While anonymous reports are accepted, providing contact information is encouraged as it facilitates a more effective investigation and allows for feedback.
- **Investigation Process:** All reports will be treated with strict confidentiality. Upon receipt of a credible report, an impartial investigation will be initiated promptly by a designated person or committee. The investigation will be fair, objective, and respect the rights of all involved parties.
- **Protection of Whistleblowers:** EMMK prohibits and will not tolerate any form of retaliation against anyone who, in good faith, reports a concern or participates in an investigation. Retaliation is a serious violation of this policy and will itself lead to disciplinary action.

5. Preventive Measures

- **Risk Assessment:** EMMK will conduct periodic risk assessments to identify and evaluate vulnerabilities to fraud and corruption within its key processes (e.g., procurement, project implementation, hiring).
- **Internal Controls:** The organization will implement and maintain strong internal financial and administrative controls, including segregation of duties, authorization limits, and diligent record-keeping, to prevent and detect irregularities.
- **Conflict of Interest:** All staff and board members must annually declare any potential conflicts of interest. Decisions must be made free from any undue influence, and individuals must recuse themselves from decisions where a conflict exists.

6. Disciplinary Actions

- Any violation of this policy will result in appropriate disciplinary measures, which may include a formal warning, suspension, termination of employment, and/or legal action, depending on the gravity of the offense.
- In cases involving criminal activity, EMMK will fully cooperate with the relevant law enforcement and regulatory authorities.

7. Policy Review and Updates

- This policy shall be reviewed at least every two years, or as required by changes in legislation or operational context, to ensure it remains current, effective, and aligned with best practices in fraud and corruption prevention.

True to the original

