

## ANTI-CORRUPTION AND WHISTLEBLOWING POLICY

### Section A: Anti-Corruption, Fraud, and Bribery

At Real Life Research Institute, we acknowledge that fraud, bribery, and corruption can weaken trust with our stakeholders, including the communities we interact with, our donors, and program participants. Hence, we hold a zero-tolerance approach to fraud, bribery, and corruption. We shall take every measure possible to prevent, find, and respond to fraud, bribery, and corruption across our networks.

Fraud, bribery, and corruption include acts of fraud, theft, nepotism, money laundering, terrorism, financing, abuse of an undeclared conflict of interest, counterfeit money, cybercrime, extortion, and other forms of financial crime.

### Roles and Responsibilities

Everyone working with or at Real Life Research is responsible for preventing, finding, and reporting fraud, bribery, and corruption.

All who work with or for Real Life Research Institute will be required to undertake fraud awareness training within three months of employment.

Real Life Research Institute employees and affiliated personnel must take all measures to reduce fraud, bribery, and corruption, including the following steps:

- Checking with the manager if unsure of what may be acceptable behavior (our workplace is a safe space to raise concerns and ask questions)
- Carry out risk assessment and document steps taken to reduce the risk of fraud, bribery, and corruption in programs and activities.
- Regularly review the effectiveness of measures taken to reduce the risk of fraud, bribes, and corruption.

- Reporting as soon as possible any behavior that may be fraudulent, corrupt, or involve bribery through Real Life Research Institute's reporting channels.

Real Life Research Institute shall ensure that third parties are aware of and understand their obligations under this Policy. We shall:

- Put this Policy on our websites
- Utilize a subcontracting agreement, which will require subcontractors to comply with this Policy as well as prevent, report, and respond to any corrupt or fraudulent activities in their organization.

## **Section B: Whistleblowing**

Real Life Research Institute encourages its employees, volunteers, members, partners, consultants, and contractors to report serious concerns related to the organization without fear of reprisal. Real Life Research Institute is committed to protecting whistleblowers from victimization and dismissal.

Concerns that should be reported include financial and sexual misconduct, abuse and exploitation of vulnerable groups, breach of policy, abuse of position, and any other activity that may bring Real Life Research Institute into disrepute.

While anonymous disclosures are discouraged, Real Life Research Institute acknowledges that unequal power relations may make anonymity the appropriate choice for the whistleblower.

Real Life Research Institute will treat disclosures with the utmost discretion and keep reports confidential except in cases where identification is required by law or is necessary to enable the organization or law enforcement to conduct investigations adequately. Real Life Research Institute will include measures for whistleblowers who believe they have been subject to retaliation.

Real Life Institute will treat all reports seriously and subject them to a thorough investigation.

Whistleblowers who consider making a report must:

- Have reasonable grounds that the allegation has occurred or is about to occur
- Indicate they are making a protected disclosure of a serious matter
- Ensure to the best of their ability that allegations are factual, accurate, complete, from first-hand knowledge, and presented in an unbiased manner.



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