



# UARctic Anti-Corruption Policy

## 1 Background and purpose

The purpose of the UARctic's anti-corruption policy is to prevent and help identify bribery and corruption. The UARctic does not tolerate corruption (the giving or receiving of bribes) in any form.

UARctic ry (association) is registered in Finland, and all activities of UARctic must comply with [Finnish legislation](#). Chapter 16 of the Criminal Code of Finland (No 39/1889) contains provisions on bribery which criminalise the acceptance and offering of gifts or other benefits in certain conditions. The nature or value of the gift or benefit is not defined in the said provisions.

*Bribery means the giving or acceptance of any gift, loan, payment, fee or benefit if its purpose is to induce dishonest or illegal behaviour or a breach of trust in the UARctic's activities.* The abuse of power or position in pursuit of personal benefit is also considered bribery. Members of the UARctic community must not pursue any personal benefit by using their position or the UARctic's property, expertise or business opportunities. Representatives of UARctic must avoid business transactions or situations with associates that may cause a conflict between UARctic and personal interests.

## 2. Scope of Application

UARctic ry (association) does not have employees. UARctic representatives addressed in this policy include member organizations, member-organization employees holding a position in UARctic governing bodies, international secretariat or committees, or any other UARctic related position.

Representatives of UARctic are usually employed by an UARctic member institution, and in addition to this policy they must follow their institutional and national anti-corruption policies, laws and regulations.

These guidelines apply to all representatives of UARctic in all situations, including those in which members of the UARctic community are offered a benefit as private individuals, but their actions are de facto based on their position UARctic.

## 3. Partners and donors

UARctic must apply the anti-corruption policy in all business relations and operations. We expect our partners and donors to commit to equivalent responsible practices. This is the basic premise for concluding and maintaining business and any other relations.

UARctic must follow equivalent principles when receiving donations in support of its activities, i.e., a donation cannot constitute hidden corruption. All donations must be appropriately recorded.

## 4. Guidelines

Modest gifts and common courtesy and reasonable hospitality are accepted as part of normal collaboration and interaction with associates, partners and service providers. Acceptable gifts or courtesy may include benefits that

- Are given or received openly, without obligation and/or expectation of reciprocation



- Can be accepted by the company's associates and held up to public scrutiny
- Are legal and modest in monetary terms
- Are given or received irregularly (excl. annual Christmas gifts)

In addition, the recipient's ethical guidelines for the prevention of corruption must be taken into account.

Benefits must not be given or accepted if

- They are not considered common and reasonable practice
- They give rise to suspicion of the motives of the giver or recipient
- They give rise to suspicion of the arrangement's impact on the results of the collaboration or on decision-making
- They give rise to suspicion that the matter could attract unfavourable publicity to UARctic
- The benefit could affect or appears to affect either party's independence or impartiality
- The benefit is in the form of cash or a gift card-

All UARctic representatives must refrain from either giving or accepting excessive gifts, entertainment or hospitality.

Special attention and caution are required if a collaboration or procurement agreement is currently being prepared.

UARctic does not provide direct or indirect support to political parties, organisations or individual politicians.

## **5. Assessment**

Representatives of UARctic who give or receive benefits must carefully assess the grounds and necessity of such benefits. Representatives of UARctic who give or receive benefits hold the primary responsibility for ensuring that the benefits comply with the criteria for acceptability outlined in this policy.

If necessary, this assessment can be performed with their supervisor at their home institution or with UARctic leadership. The assessment must take into account the individual circumstances, the nature and purpose of the benefit, and the status of the giver and recipient as well as their connections to collaboration.

## **6. Responsibilities**

UARctic is committed to the practical implementation of the anti-corruption policy.

The UARctic Board has approved this policy and holds the overall responsibility for compliance with them at UARctic. The President is responsible for the coherent implementation of the policy based on a clearly defined authority. The Board, the President and other members of senior management must be active and visible examples in applying this policy to all their activities.

All partner and member organizations are required to comply with this policy. In context of annual membership fee payment members thereby confirm that they have communicated the policy to their employees having UARctic related tasks and have reported any violation of the policy that they are aware of to UARctic. Partner organizations follow similar protocol.



## **7. Money Laundering**

UARctic representatives are prohibited from having any dealings with, or participating in, any transactions involving funds or resources that may represent the proceeds of crime. Employees should notify the President of UARctic or act according to the reporting procedures below if they have any uncertainty or concern about the lawfulness of any payment, money or transaction. Any suspicions of money laundering should be reported immediately.

## **8. Reporting Procedures**

All UARctic representatives are strongly encouraged to report suspected instances of corruption or bribery and other violations of this policy to their superior or to the Director of Governance and Finance Support personally by e-mail to [anti-corruption@uarctic.org](mailto:anti-corruption@uarctic.org).

UARctic has also a mail address through which concerns and issues can be confidentially addressed to the Director of Governance and Finance Support.

Director of Governance and Finance Support / CONFIDENTIAL

UARctic International Secretariat

c/o University of Lapland

PO Box 122

96101 Rovaniemi FINLAND

Since UARctic has no employees, there is no obligation to set up a whistleblowing channel based of European Union Whistleblowing Directive or corresponding national Act. Therefore reports through UARctic reporting channels will not be handled according to the Whistleblowing Act, but in all instances the rights and privacy of both the reporting person(s) and anyone named in such a report will be protected to the fullest extent possible. Retaliation of any sort against anyone who has made such a report is prohibited.

## **9. Handling**

Any reports of violation of this policy or other misconduct will be handled confidentially. Inspections will be made by Ethics Committee consisting of members of the Board Executive summoned by the Director of Governance and Finance Support OR Outsourced inspection partner.

Reports may be made in person or by letter, telephone, e-mail, or other means and will be treated as confidential, to be used solely in connection with addressing the specific problem(s) the report concerns.

Reports are reviewed carefully by the responsible persons who maintain confidentiality to the fullest extent possible. All reported and suspected violations of this Anti-Corruption Policy will be investigated.

## **10. Penalties**

Violation of these Rules may result in disciplinary action up to and including UARctic representative person forfeiting their position in UARctic, member organization dismissal, mutual project suspension or termination and may have further legal consequences, including criminal sanctions, in accordance with applicable law.