



ANTI-CORRUPTION POLICY

OCTOBER 2018



Zero tolerance towards corruption

The Ministry of Foreign Affairs of Denmark (the Ministry) is a globally operating organisation. We work for Denmark's interests and values in relation to the surrounding world. Staff are in contact with numerous other public institutions, organisations, NGOs, ordinary citizens, commercial companies and other counterparts all over the world. The Ministry, and thus Denmark, actively supports the international fight against corruption and advises partners on how to avoid corruption.

The Ministry is determined to maintain the highest standards of integrity and work ethics among staff across all areas of activity, as well as ensuring the proper administration of public funds. For this reason, the Ministry maintains a policy of **zero tolerance** towards corruption in all its forms. Conduct contrary to the Ministry's anti-corruption policy could thus have employment law consequences.

This Anti-Corruption Policy and its Code of Conduct are applicable to all staff at the Ministry, Danish Missions abroad and the Danish Fisheries Agency. Its purpose is to ensure and support behaviour and work ethics characterised by the highest standards of personal and organisational integrity, both internally and externally with our many different partners.

This Anti-Corruption Policy provides guidance to staff in the foreign and home service on their required conduct when confronted with corruption, corrupt practices or corrupt propositions, in addition to providing general guidelines for the work to prevent corruption.

What is corruption?

Corruption is defined as the misuse of entrusted power for private gain. It affects everyone whose life, livelihood or prosperity depends on the integrity of people in a position of authority, it threatens the stability and security of societies, and it undermines democratic institutions and values.

This definition corresponds to the concept of corruption in the Danish Penal Code and in international anti-corruption conventions, including the United Nations Convention against Corruption, and it covers situations involving the taking and giving of bribes as well as other types of active or passive corruption.

Corruption is best known in the form of bribery, fraud, embezzlement or extortion. However, 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 quicker case processing.

Anti-Corruption Code of Conduct

All Ministry staff, including at Danish Missions abroad and the Danish Fisheries Agency, will respect and promote the principles of the Code of Conduct presented below.

1. Conflict of interest

We will avoid any conflict – real or potential – between our personal interests and the interests of the Ministry of Foreign Affairs.

Conflicts of interest arise from situations in which a member of staff has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of their official duties. Private interests include any advantage to oneself or one's family, close relatives, friends and persons or organisations with which one has or has had business or political relations. When faced with a potential or actual conflict of interest, staff are required to promptly inform their superiors.

2. Bribery

We will not give or accept bribery in any form.

Bribery is the act of offering, giving, promising (active bribery), receiving, soliciting or accepting (passive bribery) something of value with the purpose of influencing the performance of public or legal duties. Bribery is a criminal offence in Denmark.

3. Extortion

We will not for private purposes seek to influence any person or body by using our official position or by using force or threats.

Extortion occurs when money or property is unlawfully demanded or received through intimidation. Extortion may include threats of harm to a person or their property, threats to accuse them of a crime/illegal act or threats to reveal embarrassing information. Extortion is a criminal offence in Denmark.

4. Fraud

We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.

Fraud is the use of deception with the intention of obtaining an advantage (financial or otherwise), avoiding an obligation or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behaviour, practising trickery or acting under false pretences. Fraud is a criminal offence in Denmark.

5. Embezzlement

We will not misappropriate or otherwise divert property or funds entrusted to us.

Embezzlement is the misappropriation or other diversion of property or funds legally entrusted to someone by virtue of their position. Embezzlement is a criminal offence in Denmark.

6. Gifts

We will not give, solicit or receive directly or indirectly any gift or other favour that may be seen to influence the exercise of our function, performance of duty or judgement. This does not include conventional hospitality or minor gifts.

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 and hospitality may be in themselves a manifestation of corrupt behaviour. They may be used to facilitate corruption, or may give the appearance of corruption. Gifts may include cash or assets given as presents, and political or charitable donations. Hospitality may include meals, hotels, flights, entertainment or sporting events.

Staff should know not to accept gifts or other advantages from private citizens or commercial companies that are offered to them due to their position at the Ministry. However, in observing and respecting local hospitality conventions, small gifts may be accepted. For more information on this, please refer to the Ministry's gift policy and the guidelines set out in the revised Code of Conduct in the Public Sector from 2017 (available in Danish and English) published by the Danish Agency for the Modernisation of Public Administration.

7. Nepotism and favouritism

We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.

Nepotism is favouritism shown to relatives or friends without regard to merit. Relatives or friends are treated favourably based on the close personal relationship alone rather than on a professional and objective assessment of their skills and qualifications.

8. Reporting corruption cases

We will report any evidence or reasonable suspicion of breach of this Code of Conduct.

All staff are obliged to familiarise themselves with the Code of Conduct and respect its principles. They are obliged to report any evidence or reasonable suspicion of a breach of the Code to their superiors.

Openness and transparency is the rule

Maximum openness and transparency is essential when fighting corruption, and information concerning the public sector is generally accessible to the general public in accordance with the Danish Public Administration Act and the Danish Act on Access to Public Administration Files.

The Ministry ensures openness and transparency towards the general public and its partners through the Ministry's own website, among other things by focusing on and providing links to:

- The Ministry's "[Economy and results](#)"
- [Reporting of possible irregularities](#)
- The [websites](#) of Danish Missions
- [The Business Anti-Corruption Portal](#)
- [Danida's fraud and corruption site](#)
- The Danida [Aid Management Guidelines](#)
- [The Danida anti-corruption hotline](#)

Internally, the Ministry ensures that all staff are familiar with the Anti-Corruption Policy through:

- An intranet page on anti-corruption
- Internal instructions and policies such as the Ministry's gift policy and instructions on notifying the Danish Auditor General
- E-learning course on anti-corruption

Where and how to report corruption

Zero tolerance on corruption entails that all staff, upon suspicion or awareness of specific cases of corruption involving other staff members, business partners, partners in programmes and projects, and others with whom the Ministry cooperates, are obliged to immediately notify their superiors or controller directly.

Upon suspicion or knowledge of specific cases of corruption, such as bribery, the decision to notify Danish or foreign authorities, including possibly reporting to the police, is taken by the Ministry on the basis of the available information. This applies to cases in Denmark as well as abroad, regardless of how the Ministry became aware of this information.

Implementation of the Code of Conduct

Ministry staff complete an anti-corruption e-learning course.

The Code of Conduct is supplemented by existing and, as and when relevant, new guidelines and instructions targeted at specific policy areas. On the Danish Fisheries Agency website, it is possible to report illegal fishing and EU subsidies (in Danish only). Danida has for several years had guidelines for development cooperation and worked actively to fight corruption. The Trade Council similarly has special anti-corruption guidelines in place.



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2. We will not give or accept bribery in any form.
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 or other favour that may influence the exercise of our function, performance of duty or judgement. This does not include conventional hospitality or minor gifts.
7. We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.
8. We will report any evidence or reasonable suspicion of breach of this Code of Conduct.

Contact

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