



POLICY:
ANTI-FRAUD AND ANTI-CORRUPTION

Version 1.0

Valid from November 2024

Relevant for:

- All employees of SciCo
- All volunteers of SciCo
- All persons who work for or on behalf of SciCo

Responsible for content:

Operations department

Purpose / executive summary

This guideline aims to support all SciCo employees volunteers and associates in preventing and handling issues of fraud and corruption. It provides information on the different forms of corruption and their consequences. Responsibilities of individual staff members.

TABLE OF CONTENTS

1 Introduction	3
(Who we are – values – accountability)	3
2 Purpose & Scope	3
3 Basic Principles	4
4 Definitions of key terms	4
5 Consequences of Corruption	5
6 Responsibilities	6
SciCo’s Responsibilities	6
Management Responsibilities	6
Co-worker Responsibilities:	7
	7
7 Reporting and Investigation	8
8 Responding	8

1 Introduction

(Who we are – values – accountability)

SciCo (Science Communication) is a non-profit organisation, focusing on **scientific engagement** and **empowerment**, through innovative, interactive, and entertaining means. It was founded in 2008, and consists of scientists, academics, educators, artists, and people with an interest in everyday science. Today, it operates as a Civic non-profit. Through [numerous high-impact outreach activities](#), such as science festivals, digital platforms, and workshops, SciCo has reached more than 400.000 people all over Greece. It has also reached audiences outside Greece by expanding some of its own projects internationally and by participating in EU Programs and Networks.

SciCo is unwavering in its commitment to ethical integrity, accountability, and inclusivity, implementing a “Train the Trainer” approach to effectively engage a wide array of audiences, particularly vulnerable groups. At the heart of its operations are comprehensive safeguarding policies on PSEA and CP, with rigorous protocols and meticulously defined measures that uphold safety across all initiatives. SciCo’s dedication to transparency and accountability permeates its financial management, stakeholder engagement, and responsible commitment to environmental sustainability. The organization places a high value on diversity and actively advances gender equality, incorporating stakeholder feedback to continually refine program quality. Through strategic partnerships, forward-thinking innovation, and responsible resource management, SciCo empowers communities, adapts to emerging needs, and cultivates a culture of mutual respect and collective purpose. Additional details about SciCo's guiding values are accessible [here](#).

Every team member holds a critical responsibility in this process, bearing the duty to actively ensure that all resources are used effectively and properly accounted for.

SciCo’s ongoing work hinges on preserving a robust level of trust with its partners. A fundamental element of this trust lies in fostering strong governance and proactively mitigating fraud and corruption at all organizational levels. Success in these efforts demands that each individual commit to a shared framework of ethical principles, including adherence to PSEA, CP, and the current anti-fraud policies.

An organization’s stance and response to corruption issues distinctly reveal the ethical standards of both the institution and its members. This guideline should, therefore, be reviewed alongside SciCo’s Code of Conduct.

2 Purpose & Scope

The Anti-Fraud and Anti-Corruption Guideline aims to:

- Define the responsibilities of personnel at all levels,
- Heighten awareness among SciCo's members, employees, and affiliates on the organization's stance and approach to handling corruption,
- Specify required actions to be taken if fraud or corruption is identified or suspected.

These guidelines is applicable to all SciCo members, employees, volunteers, subcontractors, and any external entities, vendors, or companies that partner with or represent SciCo in any capacity.

3 Basic Principles

SciCo has established the following fundamental principles as the foundation for its approach to preventing and addressing fraud and corruption:

4 Definitions of key terms

CORRUPTION within SciCo is described as actions or behavior that exploit a person's role or authority for personal gain or to benefit another individual or organization. This includes the misuse of power for personal or third-party financial or non-financial advantages, such as accepting bribes, disclosing confidential information, or misusing organizational assets.

Corruption encompasses a variety of actions, including but not limited to the following:

BRIBERY: the improper exchange in which an individual, organization, or institution provides goods and/or services in return for undue compensation. Bribery requires participation from at least two parties. Included within bribery are **KICKBACKS**, where an individual involved in procurement receives a "reward" from a supplier for approving an order of goods or services.

CONFLICT OF INTEREST: occurs when an individual has a personal interest that may influence their actions, even if it does not result in any improper behavior.

EMBEZZLEMENT: the unauthorized appropriation of resources for personal benefit, often involving only one person.

EXTORTION: obtaining something through force, threats, or unwarranted demands.

THEFT: the unauthorized taking or use of property belonging to the organization, a co-worker, or any person or entity on the organization's premises.

FAVOURITISM: giving preferential treatment to one individual or group unfairly over others. This includes **NEPOTISM**, where favoritism is extended to relatives, particularly in the granting of roles or privileges.

FRAUD: is a form of corruption involving criminal deception or misleading representation to achieve an unfair benefit. Within SciCo, fraud includes the intentional misuse of resources, which can involve acts of dishonesty, deception, omission, or improper use of influence, position, or information. Examples of fraudulent acts include:

- Theft of assets
- Unauthorized or illegal use of organizational resources, information, or services for personal gain
- Misappropriation of funds
- Record falsification for unfair advantage
- Taking leave without recording it
- Bribery and embezzlement
- Forgery of signatures or information on documents

GIFTS: Accepting gifts of minimal or symbolic value, given as a token of appreciation or in accordance with local customs, is not considered corruption under these guidelines. However, to avoid any potential conflict of interest, all gifts received by employees in the course of their duties must be reported to their manager. Any gifts over 50 euros may only be accepted on behalf of SciCo and not as personal gifts.

5 Consequences of Corruption

Corruption detrimentally affects both the organization and the individuals involved.

The potential consequences for the organization include:

- Erosion of reputation and goodwill among stakeholders, partner organizations, and other key actors.
- Reduction in available funding due to diminished trust and confidence from donors and institutions.
- Increased operational and program implementation costs.
- Exclusion from certain activities and diminished collaboration with essential external partners, including governmental bodies, institutional funders, and other agencies.

- Adverse effects on the internal working environment, impacting employee morale and cohesion.
- A consequence of an unfriendly, hostile atmosphere is due to a loss of trust, which impacts organizational culture.
- Decrease the quality of services from suppliers when contracts are awarded based on corruption rather than performance standards.

Potential consequences for individuals involved include:

- Irreparable damage to their career and personal reputation.
- Loss of eligibility for a reference letter from SciCo and its associates.
- Employment sanctions, including potential job termination.
- Exposure to criminal and/or civil proceedings initiated by the organization.
- Personal embarrassment and shame within SciCo, as well as among colleagues, friends, and family.
- Reduced capacity to provide direct services and support to beneficiaries, diminishing their positive impact.

6 Responsibilities

In accordance with

SciCo's Responsibilities

The General Director holds the following responsibilities:

1. To ensure robust security measures are implemented to mitigate the risk of fraud and corruption. This encompasses the establishment of secure facilities for property storage and procedures aimed at deterring corrupt practices and theft.
2. To create effective channels for gathering information from colleagues, stakeholders, and the communities served concerning allegations of fraud or corrupt activities within the Organization.
3. To establish and enforce procedures for a feedback mechanism that safeguards informants who disclose information about fraud or corruption, protecting them from discrimination or victimization.
4. To undertake thorough investigations of all complaints related to actual or suspected fraud or corruption.
5. To report incidents of fraud or corruption to the police's anti-corruption division and to cooperate fully with any ensuing investigations.
6. To ensure that managers and staff understand their obligations regarding fraud and corruption.
7. To foster a culture and environment that actively discourages fraudulent and corrupt activities encourages prompt reporting, and promotes effective practices and preventative measures against such misconduct.

Management Responsibilities

Managers are tasked with the following responsibilities:

1. To set a positive example that fosters an environment where fraud and corruption are actively discouraged, enabling co-workers to feel at ease when reporting allegations, including suspected instances of fraudulent behavior. This supportive atmosphere is cultivated through the manager's own stance on fraud and corruption, as well as their capacity to promote accountability and integrity among their team and colleagues.
2. To oversee the conduct of co-workers, volunteers, vendors, and external associates with whom they collaborate, ensuring the protection of property under their stewardship.
3. To promptly report any suspected cases of fraud or corruption to the General Director, regardless of whether these activities occur within their designated area of responsibility.
4. To ensure that newly hired co-workers are informed of their duties concerning fraud and corruption and adhere to the established code of conduct.

Co-worker Responsibilities:

Co-workers are entrusted with the following responsibilities:

1. To perform their roles and duties with honesty and integrity. Any situations where these principles may be compromised or perceived to be compromised should be promptly reported to their supervisor for resolution. This includes addressing potential conflicts of interest or any perceptions thereof.
2. To comply with these guidelines and all other procedures established by SciCo aimed at preventing and managing fraud or corruption. Violation of these guidelines may result in disciplinary action from SciCo.
3. Exercise appropriate care over the resources within their control and report to their supervisor any situations that may put property at risk.
4. To promptly inform their supervisor of any fraudulent or corrupt activities they become aware of.
5. To report any colleagues or third parties suspected of involvement in fraud or corruption in accordance with these guidelines.
6. To disclose any potential conflicts of interest to their direct supervisor, regardless of whether any improper conduct has occurred. The supervisor will then consult with the General Director to determine the appropriate course of action. This procedure applies to potential instances of nepotism.

7 Reporting and Investigation

All members, including managers and co-workers, bear a definitive responsibility to act whenever corruption is reasonably suspected. A mere indication of suspicious circumstances is sufficient grounds for a response. This includes instances where an individual, in good faith, believes that evidence uncovered or observed suggests potential fraud or corruption. In all actions undertaken, due regard must be given to relevant national laws and regulations concerning anti-fraud and anti-corruption.

1. Managers or co-workers who are aware of, or have reasonable suspicion regarding, fraudulent or corrupt conduct are obliged to report the matter to one of the following:
 - Their supervisor
 - The General Director
2. Any reports of corrupt activity received should be forwarded to the General Director.

3. All allegations of fraudulent or corrupt acts, regardless of whether they are submitted anonymously, will be investigated by the General Director within one month of being notified. When deemed appropriate or necessary, the General Director may enlist the assistance of a Human Resources or legal consultant. Individuals who initially make the allegation should not be included in the investigative team. The anonymity of an allegation shall not influence the decision to conduct an investigation; rather, the critical factor is whether the allegation provides sufficient information to warrant further inquiry. In this context, an assessment by a qualified individual is an integral component of the investigation. All decisions rendered must be meticulously documented and include those indicating that an investigation will not be pursued.
4. Investigations will be carried out in a manner that safeguards the identities of those who make allegations.
5. The processes followed during investigations and the findings derived will be meticulously documented in a comprehensive report.

8 Responding

1. The General Director will determine the necessary subsequent actions based on the findings of the investigation, which may involve commissioning an external investigation or audit.
2. Employees found to be involved in fraudulent or corrupt practices or those who have exhibited negligence in fulfilling their supervisory responsibilities will face disciplinary measures, potentially leading to the termination of their employment. Where appropriate, civil and/or criminal proceedings may also be initiated against the individuals implicated.
3. Any disciplinary measures imposed on an employee will be executed in compliance with all applicable local employment and labor regulations.
4. Employees who become aware of potential corruption within the organization and fail to report it will be considered in violation of their responsibilities and may face disciplinary action.
5. Employees who make disclosures that they know to be false or do so recklessly without regard for their truthfulness may expose themselves to disciplinary repercussions under the prevailing national laws.
6. The General Director will conduct a review of the area where the alleged fraud or corruption has occurred to ascertain the underlying causes of any control failures and will implement necessary modifications to systems and procedures. It is the responsibility of the relevant manager to execute any recommendations put forth by the General Director.