

Integrity Framework

Our Integrity Framework at Women Win

Women Win believes in a future where every girl and woman exercises her rights. One of the keys to actualising that vision for the future is to ensure the organisation operates to the highest ethical standards. To do this, we have developed the following integrity framework and nominated an Integrity Officer on staff to ensure the contents of this framework are embedded in all of our work.

The four elements of this framework are as follows:

[Safeguarding Policy](#)

This document outlines our vision of collective responsibility in ensuring the safety of all people involved in our work, the measures we will take to prevent safeguarding incidents, and how we will respond if they do occur.

[Code of Conduct](#)

This document establishes a set of behavioural standards to be upheld by all staff and representatives of Women Win in their work.

[Anti-Fraud and Anti-Corruption](#)

This policy details how Women Win staff and representatives are expected to navigate fraud and corruption risks, and provides tools for mitigating these risks.

[Complaints & Whistleblowing Procedure](#)

This procedure provides details of the external reporting service in place for lodging complaints or anonymously whistleblowing violations of our policies.

The above policies lay out the standards which Women Win aim to uphold in all of the work undertaken by, and on behalf of, the organisation, and details the external reporting procedures in place.

Terminology

- Stichting Women Win (registered in the Netherlands with KVK number 34267612), Women Win Foundation Inc. (registered in Massachusetts with EIN 26-4645645) and Women Win Foundation (registered in Delaware with EIN 33-1501167) are hereafter collectively referred to as “**Women Win**”.
- “Employees” refers to anyone with an employment agreement (whether permanent, fixed-term or temporary) with Women Win.
- “Associates” refers to board members, contractors and consultants engaged by Women Win, volunteers and interns who work with Women Win, dependents accompanying Employees when on business, and any other individuals acting as Women Win representatives.
- Beyond this point, Employees and Associates are collectively referred to as “staff”.

Evaluation and Revision

This framework is revised on an annual basis by the Integrity Officer who updates this document and communicates any changes to the organisation. Any changes in the policy will be legally binding for all staff from the moment that the updated document has been communicated.

Date Finalised	Date Shared	Important changes made
02-02-2024	02-02-2024	n/a
20-05-2025	20-05-2025	<ul style="list-style-type: none"> - References to the UK entity have been removed. - The Code of Conduct has been expanded to explicitly prohibit lobbying and political work, as per US regulations. - The Complaints and Whistleblowing Procedure has been expanded to include more details regarding "No Retaliation".

For more information or to provide feedback, please contact info@womenwin.org

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Code of Conduct

General Principles

Women Win staff must comply with the laws and regulations governing operations in their jurisdiction, and further must maintain the highest standards of honesty and integrity in their conduct of such operations. The staff must operate with a constant regard for Women Win's good name and reputation as a rights-based development organisation. Each staff member will:

1. Respect the rights and dignity of the children, families, and communities with whom we work and always act according to the best interest of children;
2. Be loyal and honest in dealings with Women Win, and not pursue personal or family gain or advantage in such dealings;
3. Be loyal and honest in dealings with programme partners, children, their families and communities participating in Women Win's programmes, donors and all Women Win staff;
4. Make proper use of Women Win's resources and information;
5. Avoid any behaviour which is or might be seen as less than honourable or would reflect badly on Women Win.

In the event any question arises as to whether conduct is permitted under this Code of Conduct, or if the conduct involves a member of the Executive Leadership team, staff members can approach the following people within the organisation:

- Line Manager/Brand Director
- Safeguarding Group Representative
- People & Culture representative
- Integrity Officer

Staff members can refer to the internal Women Win Lines of Communication procedure for guidance.

Political Contributions and Engagement

Women Win cannot directly or indirectly make any contribution to a political candidate or party, including granting staff time off with pay for political activity.

In accordance with IRC Section 501(c)(3), Women Win staff are restricted from participating in, or intervening in, any political campaign on behalf of (or in opposition to) any candidate for public office. Additionally, Women Win staff may not attempt to influence legislation within the meaning of IRC Section 501(c)(3) and the regulations thereunder or to engage in other legislative lobbying activities of any nature.

Gifts and Entertainment

When dealing with government personnel, children, their families and communities, donors, suppliers and other persons, staff must be guided by two principles: never to use their position to obtain personal gain; and never to be obligated to persons with whom Women Win does business. The staff must conduct themselves at all times in a manner that avoids suspicion of such behaviour.

The staff must not be involved in paying or accepting any bribe, kickback or other unlawful payment or benefit to secure any concession, contract or other favourable treatment. The

staff must not give any gift, entertainment or benefit to any supplier or public official in circumstances where such an action could be viewed as attempting to secure the favour of such a person.

Reasonable business entertainment and/or gifts may be furnished and/or accepted by the staff whose duties require them to do so provided that a proper accounting of the expenditures/benefit is made in writing to the Executive Director, or in the case of the Executive Director, to the Chair of the Board. In determining what is reasonable, the entertainment and/or gifts should not be of such value as to constitute a personal gain for the recipient and should not be such as to appear excessive to an objective observer.

Procurement & Contracts

Procurement procedures should reflect ethical business practice in that:

- They should be based on fairness and equality of treatment for bidders;
- They should be set out clearly and unambiguously;
- They should be meticulously applied and should encompass detailed recording of all stages of negotiation.

Proper Control and Accounting

Compliance with prescribed controls, accounting systems and rules is required at all times. The accounts must accurately reflect and properly describe the transactions they record.

Personal Conduct

Concern for Children, their Families and Communities

The staff must do nothing that may cause emotional, physical or financial harm to the children, their families or communities with which Women Win works. The staff must be concerned about perception and appearance in their language, actions and relationships with children.

Employees may never:

1. Use language, make suggestions or offer advice that is inappropriate, offensive or abusive;
2. Behave physically in a manner which is inappropriate or sexually provocative;
3. Have a child/children with whom they are working stay overnight at their home unsupervised;
4. Sleep in the same room or bed as a child with whom they are working;
5. Do things for children of a personal nature that they can do for themselves;
6. Condone or participate in behaviour of children which is illegal, unsafe or abusive;
7. Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
8. Discriminate against, show differential treatment to, or favour particular children to the exclusion of others;
9. Hit or otherwise physically assault or physically abuse children;
10. Develop physical/sexual relationships with children;
11. Develop relationships with children which could in any way be deemed exploitive or abusive;
12. Spend excessive time alone with children away from others;
13. Hire children as 'house help' or provide shelter for children in their home in inappropriate circumstances;

14. Fondle, hold, kiss, hug or touch children in an inappropriate or culturally insensitive way;
15. Use behaviour towards children which could be interpreted as being abusive.

Disclosure and Use of Women Win information

Staff who have access to Women Win's internal business information or information about sponsored persons or projects or about donors are in a position of trust. They must not disclose or use such information outside the normal requirements of their job. In particular, they must not disclose any information that would put a participating local organisation or girls and women involved with such a local organisation at risk.

Personal Conduct Outside of Work

Unlawful conduct or other misconduct by Women Win staff, which may jeopardise Women Win's reputation or position must be avoided, whether during or after business hours. Such conduct includes, but is not limited to: any unlawful activity related to sexual abuse, any other unlawful activity, sexual harassment, physically/verbally abusive behaviour, and public disorderly conduct.

Dealings with Children, their Families and Communities

Staff are not to use the property of or employ the efforts of children, families or communities for the benefit of the staff or the benefit of the staff's family.

Reporting Code of Conduct violations

Staff and external stakeholders are expected to report Code of Conduct violations through the reporting procedures detailed in the [Complaints & Whistleblowing Procedure](#).

Evaluation and Revision

This Code of Conduct is revised on an annual basis as part of the Integrity Framework annual revision by the Integrity Officer who updates this document and communicates any changes to the organisation. Any changes in the policy will be legally binding for all staff from the moment that the updated document has been communicated.

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Anti-Fraud and Anti-Corruption Policy

About this policy

At Women Win we are deeply committed to doing the right thing, the right way at the right time. Our code of ethics and behaviours outlines the standards and behaviours that Women Win upholds as an organisation. Today, this is more important than ever, not only because of the strict rules brought in by donors in order to safeguard public funds, but because as we grow, we must pay even closer attention to international laws and standards very specific to anti-fraud and anti-corruption.

At Women Win, we operate a zero-tolerance approach to the making or receiving of bribes or corrupt payments, in any form. This type of conduct is absolutely prohibited whether committed by employees or anyone else acting on the organisation's behalf.

The Women Win Board of Directors considers bribery and corruption risks as a standing item on their agenda and are updated on this topic on a regular basis, as well as being provided with ad hoc updates when necessary.

This policy sets out the requirements and recommendations to help prevent fraud and corruption in all its forms where Women Win funds, provides assets or where Women Win interests are involved. If you are in any doubt as to whether any conduct could amount to international definitions of bribery or fraud, the matter should be reported through the [Complaints & Whistleblowing Procedure](#). It is essential that all Women Win staff carefully read and completely comply with this policy.

A bribe may include any payment, benefit or gift offered or given with the purpose of influencing a decision or outcome. The bribe may not always be of large value. It could be a small lunch or an invitation to a sporting event.

A fraud is a corrupt practice, a wrongful or criminal deception intended to result in financial or personal gain. A fraud implies a person, action or thing intended to deceive others, typically by unjustifiably claiming or being credited with accomplishments or qualities.

We recognize that common and/or cultural practices vary across the territories wherein Women Win is present through partners, programs, or projects. However, we are fully committed to complying with our obligations under the applicable legislation in the Netherlands, and the US. This includes the [Foreign Corrupt Practices Act \(FCPA\)](#) in the US and [articles 177, 178, 328ter and 328quater in the Dutch Criminal Code](#).

Who must comply?

The Women Win Anti-Fraud & Anti-Corruption policy is mandatory for all Women Win employees, agents, intermediaries, consultants, contractors, distributors, sub-contractors, suppliers, and program partners working for or on the organisation's behalf anywhere in the world.

All our partners are expected to conduct themselves in accordance with the standards set out in this policy and replicate (at minimum) these policies amongst their own employees, contractors, and partners.

The prevention, detection and reporting of fraud or corruption in any form is the responsibility of all employees across Women Win's organisation and all individuals and/or entities that are representing or related to Women Win. Organisations must ensure that appropriate confidential channels for employees are in place to report any suspicion of fraud or corruption. Any failure to comply with this policy will be treated seriously and may result in disciplinary action, legal action or termination of contract.

How do you comply?

You, representing your organisation, must read carefully and abide by the terms of this policy.

What happens if you don't comply?

For staff:

Any act of fraud or corruption, in whatever form, is unacceptable. Women Win will take disciplinary action against anyone who fails to comply with the Anti-Fraud and Anti-Corruption policy. Failure to comply with this policy may also leave you open to a criminal prosecution.

For Women Win Partners:

A breach of this policy by an employee of a programme partner could result in the organisation breaching the policy. This offence can result in the cancellation and termination of existing sub-grant agreements and would likely lead to long term negative publicity and serious damage to the reputation of Women Win and its involved programme partners.

What you cannot do

Prohibited Conduct

The following conduct is absolutely prohibited under this Policy:

- making or accepting a bribe in any form;
- making unofficial payments to officials in order to obtain any permission, permit or stamp particularly in connection with importing or exporting goods;
- appointing any third party or supplier to act on behalf of Women Win who you know or have good reason to believe to have engaged in corrupt or unlawful conduct;
- paying any third party for the purposes of being a 'fixer' to 'open doors' and make connections of any kind.
- as per the FCPA, it is forbidden to offer, pay, or promise to pay money or anything of value to any foreign official for the purpose of obtaining or retaining business.

Facilitation Payments

Facilitation payments ('facilitating', or 'speed', 'back-hander' or 'grease' payments) are any payments, usually small cash payments made to low-level officials, made as a bribe to secure or expedite the performance of a routine or necessary action or level of service. Women Win employees or its program partners must **never** offer, pay, solicit, or accept bribes in any form, including facilitation payments.

Exception: The only exception to paying a facilitation payment is where your life is in danger. If a facilitation payment is made in such circumstances, it must be reported as soon as practicable or possible to any of the following people:

- Line Manager/Brand Director/Executive Leadership Team Member
- Safeguarding Group Representative
- People & Culture representative

- Integrity Officer

Women Win staff should report any instance where a facilitation payment is alleged to have been paid on the organisation's behalf through the [Complaints & Whistleblowing Procedure](#).

Due Diligence – Partners & Suppliers

Where there is a significant bribery risk, all staff and program partners must consult Women Win Management in relation to appropriate anti-bribery compliance measures before:

- appointing a new supplier;
- entering into a partnership;
- appointing an agent to work on the organisation's behalf;
- entering into a new contract/ or amending the terms of an existing contract.

A significant bribery risk may arise if:

- The supplier, partner or agent etc. is based in a High-Risk Country/Jurisdiction;
- The services involve business partners paying fees, taxes, or payments on behalf of Women Win in relation to the import or export of goods;
- The service involves partners obtaining official permits, permissions, or agreement from public officials or agencies;
- There are any particular reasons to suspect that the risk of corruption or bribery is higher than normal.

Potential indicators of corruption (Source: Serious Fraud Office, UK):

- Abnormal cash payments;
- Pressure exerted for payments to be made urgently or ahead of schedule;
- Payments being made through a 3rd party country (e.g. goods or services supplied to country 'A' but payment is being made to shell company in country 'B');
- Abnormally high commission percentage being paid to a particular agency. This may be split into two accounts for the same agent, often in different jurisdictions;
- Private meetings with public contractors or companies hoping to tender for contracts;
- Lavish gifts being received;
- An individual never taking time off even if ill, never taking holidays, or insisting on dealing with specific contractors themselves;
- Making unexpected or illogical decisions accepting projects or contracts;
- An unusually smooth process of a case where the individual does not have the expected level of knowledge or expertise;
- Abusing decision process or delegated powers in specific cases;
- Agreeing contracts not favourable to the organisation either with terms or time period;
- Unexplained preference for certain contractors during tendering period;
- Avoidance of independent checks on tendering or contracting processes;
- Raising barriers around specific roles or departments which are key in the tendering/contracting process;
- Bypassing normal tendering/contractors procedure;
- Invoices being agreed in excess of contract without reasonable cause;
- Missing documents or records regarding meetings or decisions;
- Company procedures or guidelines not being followed;

- The payment of, or making funds available for, high value expenses or school fees etc. on behalf of others.

Gifts, hospitality, and entertainment

All Women Win employees are expected to conduct themselves with integrity, impartiality, and honesty at all times. Accordingly, all employees are required to follow these rules on gifts, hospitality, and entertainment. In addition, employees of Women Win program partners or subsidiaries, whether in the NL, US or elsewhere, are required to follow these standards.

Gifts and entertainment given and received as a reward, inducement, or encouragement for preferential treatment, or inappropriate or dishonest conduct are strictly prohibited. In particular, no gifts, hospitality or entertainment may be given or accepted during a tender process or during contractual negotiations if there is any realistic risk that such gifts or entertainment could influence the outcome of such processes or negotiations.

It is important that all Women Win employees' actions are able to withstand scrutiny, and not cause any embarrassment to the organisation, yourself or any third party, including contractors or suppliers.

Reporting fraud and corruption

Any suspicions of fraud or corruption should be reported as soon as possible. Women Win aims to conduct its operations with the highest standards of ethics, honesty, and integrity, and recognises that you have an important role to play in maintaining this aim. Anyone concerned about a potential incident of bribery or fraud, any form of malpractice, improper action, or wrongdoing by the organisation, its employees or other stakeholders are strongly encouraged to report the matter to Women Win.

We believe it is essential to create an environment in which you feel able to raise any matters of concern. This should always be without fear of disciplinary action, in the knowledge that you will be taken seriously, and that the matters will be investigated appropriately and, as far as practical, be kept confidential.

Women Win believes that any employee or programme partner with knowledge of bribery in any form should not remain silent. We take all matters of malpractice, improper action, or wrongdoing very seriously and **you are strongly encouraged to raise incidents or behaviours that are not in accordance with the policy**, through our external reporting procedures detailed in the [Complaints and Whistleblowing Procedure](#).

The organisation recognises that there may be some cases where no wrongdoing is found through internal procedures. Protection will be given, and no disciplinary action taken, if the disclosure is reasonable, made in good faith and the information believed to be true.

Record Keeping

Women Win will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Evaluation and Revision

This Anti-Fraud and Anti-Corruption Policy is revised on an annual basis as part of the Integrity Framework annual revision by the Integrity Officer who updates this document and communicates any changes to the organisation. Any changes in the policy will be legally binding for all staff from the moment that the updated document has been communicated.

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Complaints & Whistleblowing Procedure

Safeguarding

For reports specific to Safeguarding breaches, please see [Annex 3 of the Safeguarding Policy](#). The service described below can also be used for reports of Safeguarding breaches where the reporter wishes to remain anonymous.

SeeHearSpeakUp Service

Women Win makes use of SeeHearSpeakUp, an external confidential reporting service for the formal report of suspected irregularities or concerns regarding violation of the Code of Conduct, and Anti-Fraud and Anti-Corruption Policy. Through the 24/7 services, (anonymous) reports can be made by employees, funders, partners, and other stakeholders.

Netherlands – 0800 022 2398	Spain – 800 600 953
Germany – 0800 000 8875	Kenya – 0800 2219 030
South Africa – 0800 990 094	USA – 1877 492 6399
Argentina – 0800 266 7499	Cambodia – +44 1224 379303
https://fileaconcern.org/womenwin	

The process will proceed as follows:

- Through SeeHearSpeakUp, the designated Authorised Receivers of Information within Women Win will receive notification of the new report.
- The case will be assigned for investigation to a relevant party within Women Win.
- The reporter will be informed as to the next steps, including timeline, through the SeeHearSpeakUp portal.
- The investigation will take place.
- Feedback and closure of the report will occur through the SeeHearSpeakUp portal.
- Whistleblowers can remain anonymous or provide contact details.

This procedure is not intended for use for the following matters:

- Regarding the awarding of grants, please refer to the contact details for the fund you are applying to or info@womenwin.org
- Regarding Internal HR matters, please refer to your HR contact person for support and advice with regard to these particular concerns.

No retaliation

In reporting any incidents of harassment, discrimination or other potential violations of law or company policies, retaliation is not acceptable. Retaliation against any employee for the good faith reporting of a suspected violation of a law or policy, or for participating in any investigation or fact-finding regarding a suspected violation, will not be tolerated. Any instance of retaliation should be reported through one of the mechanisms provided, including those listed in this policy. An employee who retaliates against someone who has reported a violation in good faith, is subject to discipline up to and including termination of employment.

Evaluation & Review

The SeeHearSpeakUp service is revised on an annual basis as part of the Integrity Framework annual revision by the Integrity Officer and Executive Leadership Team. This

includes reviewing how Women Win has handled all whistleblowing reports and formal complaints that have been received in the previous 12 months.

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