

The Hunger Project Commitment to Halt Fraud and Corruption

It is the policy of The Hunger Project to have zero tolerance of fraud and corruption.

Corruption includes offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party. Fraud includes any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation. Fraud also includes acts such as misuse or misappropriation of funds, such as through bank transfers and currency conversion.

Our commitment to halt corruption includes, but is not limited to, compliance with all applicable good governance standards and the US Foreign Corrupt Practices Act as well as the applicable laws in each country in which we operate. Corruption is a condition that holds hunger and poverty in place, and transforming such conditions is the fundamental objective of our programs.

There are at least nine ways The Hunger Project not only avoids and prevents corruption in its own operations, but works to instill principles of integrity and honesty in the society it helps to build.

- 1) We only work in countries where (a) there is sufficient stability and rule of law for our methodology to succeed and (b) where we have sufficient high-level government support such that our staff and partners can feel safe to say “no” to demands for bribes.
- 2) We work on the principle of self-reliance, minimizing the input of outside resources that can become the targets for attempted corruption.
- 3) We maintain the highest standards of accounting in our finances. Funds are transferred on a quarterly basis only after rigorous review of financial reports, and external audits are conducted every year which meet USGAAP standards.
- 4) We have a written code of conduct, which is posted in all offices and utilized in staff training and orientation.
- 5) We review, document and certify our compliance with good governance standards, including those of InterAction and the Better Business Bureau.
- 6) We have a whistleblower policy, prominently posted, which defines exactly what steps are to be taken when an instance of corruption is suspected.
- 7) We have a conflict of interest policy which addresses issues such as inappropriate acceptance of gifts or misuse of resources, also prominently posted, and to which each officer and director must regularly certify their compliance.
- 8) Our managers and supervisors are accountable for implementing and upholding these policies.
- 9) Instances of corruption are immediately and vigorously punished.

These practices are intended to create an environment where the best in people will have the opportunity to flourish. As the world grapples with the issue of corruption, we look forward to learning and adopting even better ways to create a world of greater justice and integrity, and we will review this commitment and the relevant policies listed above at least every two years.

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