

HANDBOOK ON BUSINESS INTEGRITY MEASURES

PRIVATE SECTOR AND CIVIL SOCIETY ORGANIZATIONS



Transparency Maldives, the National Chapter of Transparency International in The Maldives, is a non-partisan organization that promotes collaboration, awareness and undertakes other initiatives to improve governance and eliminate corruption from the daily lives of people. Transparency Maldives views corruption as a systemic issue and advocates for institutional changes that will punish and prevent corruption.

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1. INTRODUCTION

This handbook seeks to provide a set of guidelines on implementing business integrity measures for business associations, professional associations, cooperative societies and civil society organizations in the Maldives. To gain credibility and trust from those that organizations seek to serve, it is important that their activities do not merely comply with a set of laws or rules but also adhere to business integrity and ethical standards and principles at the organizational level.

1.1 Purpose of the Guide

This handbook is designed as a tool to help organizations implement measures that encourage business integrity and assess whether their current policies and practices align with business integrity best practices. The guidelines and policy templates provided in this handbook are designed to be broadly applicable to business associations, professional associations, cooperative societies and civil society organizations, regardless of the organization's scope and nature of work.

All organizations can benefit from adopting measures suggested in this handbook as the adoption of best practices and minimum standards of business integrity, provides an ethical check for an organization, and also serves as a statement to beneficiaries, donors, and the public that the organization values the importance of business integrity standards.

The handbook is designed to be used as both a self-regulatory checklist and a tool for discussion for organizations to reflect and review its own core principles, values, standards and ways of conducting its services and activities.



1.2 How to use this handbook

The handbook provides guidelines on nine areas of business integrity including transparency, accountability, internal control, fundraising and resource mobilization, procurement, whistleblowing and reporting, conflict of interest, gift policy and code of conduct. Organizations can firstly assess if their existing policies and practices cover the provided checklist-style guidelines. In addition to guidelines, the handbook also provides policy frameworks or templates in the following areas:

- Whistleblowing and reporting
- Conflict of Interest
- Gift Policy

The policy frameworks and templates are designed to make it easier for organizations to modify and adopt business integrity policies, based on these templates. Translations of these policy templates are also provided in Dhivehi, as attached in the annexes.

This handbook also provides a self-assessment tool as an organization checklist for organizations to assess their own compliance to business integrity standards and policies and prioritize which areas in their operations need better compliance to business integrity standards.



2. TRANSPARENCY

Transparency refers to the act of being open and proactively disclosing information, rules, plans, processes and actions; and is one of the key business integrity standards all organizations should uphold and adhere to. Where members and the public are able to access information about an organization, and where the organization is proactively transparent, trust in the organization will be enhanced. Transparency standards can also act as a deterrence for corrupt practices/behavior. To garner public confidence and trust, organizations should demonstrate that they are accountable and transparent to the public and proactively disclose information.

Organizations can enhance transparency by undertaking the following transparency measures, except when information is legally protected such as, for reasons of protection of intellectual property or other confidential information.

- Public disclosure of information about the organization's governing board members and senior management.
- Public disclosure of information on programs, outcomes and annual work plans.
- Public disclosure of policies and governing documents.
- Public disclosure of annual activity and financial reports.
- Public disclosure of recruitment announcements.
- Public disclosure of procurement announcements.
- Ensure that the organization has an online platform, either a website or presence on other free social media platforms and that information is updated regularly.



3. ACCOUNTABILITY

Accountability refers to the concept that organizations are held responsible for the execution of their duties and the decisions and actions in their area of responsibility. Accountability measures will instill trust and confidence both internally and externally for an organization and will ensure everyone is answerable for their actions and deter abuse of authority.

There are many measures organizations can undertake to promote accountability including:

- Ensure effective record keeping of decisions in the form of minutes, including reasoning behind decisions which will allow others to review decisions.
- Ensure that mechanisms are in place internally to undertake disciplinary actions inclusive of effective, dissuasive and proportionate sanctions for violation of internal policies and code of conduct.
- Ensure that administrative procedures are in place to uncover and investigate corrupt behavior.
- Establish a legal unit or function in the form of legal advisor in the governing board, a legal officer in the operations team or a pro bono legal advisor, in order to ensure compliance to rules and regulations.
- Establish a whistleblowing and reporting mechanism so that employees, members, volunteers and associates can report complaints and concerns.
- Ensure that the whistleblowing and reporting mechanisms are accessible and reliable, and provide protection from all forms of retaliation.



4. INTERNAL CONTROL

Internal controls are rules, procedures and practices that are designed to systematically prevent opportunities for misuse and misappropriation of finance and assets, and ensure compliance. Properly laid out internal control measures will set forth the procedures the organization will follow in its financial management and operational effectiveness.

Establishing adequate internal controls help the organization in a number of aspects by:

- ▶ Acting as a deterrence to fraudulent and corrupt practices.
- ▶ Safeguarding the organization and its resources and assets.
- ▶ Setting a system of checks and balances.
- ▶ Ensuring that resources are used in a transparent and effective manner to achieve its mission.
- ▶ Strengthening the trust of its members and stakeholders; especially donors or funding bodies.
- ▶ Ensuring compliance with relevant laws and regulations.
- ▶ Establishing a mechanism that can hold responsible individuals to account.
- ▶ Identifying risk areas or weak areas that have the potential to be abused.

The following must be considered in designing an adequate and effective internal control mechanism in an organization:

- ▶ Establish policies and procedures for financial management.
- ▶ Establish the required level of authorities for reviewing or authorization of transactions.
- ▶ Segregate duties, particularly in financial processes in order to ensure checks and balances.
- ▶ Maintain financial records along with records of relevant meetings or communications or decisions.
- ▶ Safeguard assets by maintaining a fixed asset register and an inventory.
- ▶ Audit to review the effectiveness of internal control measures and identify areas for improvement.

5. FUNDRAISING AND RESOURCE MOBILIZATION

Organizations seek resources for their growth and operations, and often an organization's access and ability to mobilize resources and raise funds plays a crucial role in its sustainability. Instead of focusing on fundraising alone, many organizations today focus and strategize on resource mobilization to obtain resources in the form of support from local communities including local expertise, volunteerism, in-kind contributions and gifts.

Organizations engage in a wide range of fundraising activities, ranging from internal fundraising through membership fees to fundraising from outside their organization from foundations, private businesses, individual donors, foreign embassies, aid agencies and government agencies. In its pursuit to mobilize funds, it is paramount that each organization has safeguards in place to ensure that donations and financial contributions it receives are not used as subterfuge for corruption and that its fundraising strategy is free of improper motive, conduct or personal benefit. To achieve this, there is a need for organizations to follow ethical standards and have internal controls to ensure that fundraising activities are consistent with the mission of the organization and do not compromise the principles of the organization.

The following ethical guidelines are set to serve as a guide for persons engaged in and/or overseeing mobilizing resources for organizations. Whilst these guidelines cannot possibly cover all potential ethical issues related to fundraising, it aims to act as a reference for decision making on whether the organization should accept a particular donation or fund, or not. These guidelines are also based on resource mobilization best practices with a view to support self-regulation.

1. All fundraising actions must adhere to **telling the truth**. Any information and materials provided about the organization must be honest, free from intentional misrepresentation and misinformation including overstating the organization's capacity.

2. Set out conditions under which the organization would decline funds or assistance. As such, review the following before accepting funds or assistance:

- If the funding or assistance is offered from an organization, business or donor whose activities align with your organization.
- If the funding or assistance is from an organization, business or donor that profits from products, services or activities that does not compromise or contradict with the organization's values.
- If the funds or assistance is offered without an explicit or implicit political motive.

- If the funding or assistance offered is not sourced or as a result of profit from illegal activities.
- If the funding or assistance is offered by a known and trusted source.

3. Accept funding or assistance for the purposes of activities or actions that are **within the scope and area of interests** permitted by the organization's objectives and strategic plans.

4. Recognize that the funds raised are on behalf of and for the public good, or in some cases for and on behalf of an organization's members, and that there is a **responsibility to be accountable and transparent**. Some measures that can be taken to commit to transparency and accountability, particularly in relation to funds, include:

- Public disclosure of information about the organization's governing board, programs, and outcomes on a website or social media platforms.
- Public disclosure of annual activity and financial reports on a website or social media platforms.
- Demarcate source of funds on publicly disclosed financial reports.
- Undertake annual audits and publicly disclose audit reports.
- Ensure that the financial requirements for projects or other actions are not over or understated when fundraising.
- Make it an internal practice to write and board/management approve project/activity reports, whether a donor requires periodic reports or not.
- Ensure adequate oversight including reviews and approval of activity and financial reports.
- Ensure adequate oversight mechanisms to protect against double funding and diversion of dedicated funds to uses other than for which funds were received or approved.

5. The **cause or mission must be the focus** of the organization instead of money or resources. Focus on how the funds will benefit communities and make a difference. Aggressive fundraising tactics focusing on money, stressing on urgency and guiltting the public or donors to donate could strain relationships or negatively impact the reputation of the organization.

6. Base resource mobilization actions on a **healthy fundraising strategy** which includes:

- Balancing approach with different goals of administration, recruitment, upgrading and program activities.
- Diversification strategies where income sources for the organization are drawn from multiple sources.
- Plans for financial sustainability of the organization.

- 7. Cultivate long term and meaningful relationships** with the community the organization seeks to serve, and with supporters who believe in the organization's cause or mission.
- 8. Comply with** donor requirements and restrictions, timely reporting; and **respect donors and funders** by using face to face engagements (where possible) and giving due acknowledgment.
- 9.** Establish a **mechanism to receive and address complaints** related to the organization's fundraising practices and tactics, open for internal and external reporting.
- 10.** Ensure that the organization **does not overly rely on and receive funds from one donor** as a control measure to prevent one donor or funder's excessive influence over the organization.



6. PROCUREMENT STANDARDS AND PRINCIPLES

Procurement is the process of obtaining goods and services in order to undertake the operations of the organization. The procurement process involves procedures in purchasing goods and services including initiation of purchasing decisions, budget allocations, method of procurement, preparation of tender, evaluation, and contracting.

As private sector organizations and civil society organizations draw their sources of income from sales, investments and other methods of generating income, their focus is more often on saving the most money, and speeding up the process to obtain the goods or services. While procurement processes vary from organization to organization, all organizations seek to obtain goods and services as economically as possible and based on sound business judgment. The following minimum standards should be included in procurement policies adopted by organizations.

Integrity:

Ensure that the procurement is carried out in compliance with internal rules and regulations; hold the transacting parties to honest and ethical actions and adherence to ethical standards; and via a fair and open competitive process in order to get the best quality product or service.

- Administrative processes and decisions should be in compliance with written rules and allow limited scope for discretionary decision making.
- Due diligence should be undertaken of suppliers, contractors and bidders.
- Planning and decision making on procurement should be distributed as much as possible.

Transparency:

Ensure that the rules, regulations, processes, plans and decisions of the procurement process are accessible to all potential bidders and public at large in order to facilitate healthy open communication.

- Establish procurement thresholds in order to decide which procurements should be subject to open competitive bidding.
- Publicly disclose information on tender opportunities, technical specifications, selection criteria, key steps of the tender evaluation process and award decision. This information can be made available on the organization's website and along with the tender announcement.

Accountability:

Ensure that the officers and executives undertaking procurement processes are held accountable.

- ▶ Record all decisions made and the reasons for the decision in order for others to review decisions.
- ▶ Segregate duties.
- ▶ Establish a whistleblowing and reporting mechanism to deter wrong doings in the procurement process.
- ▶ Establish disciplinary action procedures.
- ▶ Establish an oversight mechanism in the form of a procurement committee.

Fairness:

Ensure that the procurement process is free from preference, judgment, self-interest and favoritism.

- ▶ Suppliers and contractors should be selected on the basis of their qualifications and technical and financial merits of their offers; and selection justification should be recorded and provided to bidders.
- ▶ Ensure equal treatment of all bids including equal provision of information, deadline setting and confidentiality.

Professionalism:

Ensure that procurement function is not merely seen as an administrative day to day task that can be performed without the necessary knowledge and skills.

- ▶ Procurement officials should be provided with continuous training on procurement laws, regulations and standards.
- ▶ Ensure that procurement officials are aware of risk areas for corruption within the procurement function or procedures.
- ▶ Procurement function must be established properly as a unit or a function with proper supervision or oversight mechanism.



7. WHISTLEBLOWING AND REPORTING MECHANISM

Whistleblowing is the most common way of detecting unethical behavior and corrupt practices among employees, members and management. Whistleblowing is the disclosure of information about a perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action. The terms whistleblowing and reporting are often used interchangeably and for the purpose of this handbook, the terms are used interchangeably.

Whilst taking into account cultural and other obstacles that prevent reporting, it is important that organizations have a safe complaints mechanism where employees, members and the general public are able to lodge complaints and report suspicious behavior. A proper whistleblowing mechanism should facilitate ways to receive and handle information, conduct investigation, undertake decision-making and corrective measures. The following are some guiding principles of a best practice whistleblowing and reporting mechanism in an organization:

- ▶ Establish a standalone policy/procedure and mechanism for whistleblowing and reporting in order to ensure certainty, clarity and seamless application of the whistleblowing policy/procedure.
- ▶ Establish a committee or unit to monitor and periodically review the operationalization of the whistleblowing policy.
- ▶ Establish robust and comprehensive protection for whistleblowers, securing their rights and ensuring a safe alternative to silence.
- ▶ Encourage the use of internal whistleblowing systems and ensure its accessibility, both internally and externally.
- ▶ Ensure a thorough, timely and independent investigation of concerns and have adequate enforcement and follow-up mechanisms.
- ▶ Ensure that the identity of the whistleblower is not disclosed without the individual's consent, and provide mechanisms that allow anonymous disclosure.
- ▶ Ensure protection of the whistleblower against any disadvantage as a result of whistleblowing. This shall extend to all types of harm, including dismissal, job sanctions, punitive transfers, harassment, loss of status and benefits, and the like.

Guided by the above principles, the following is a template which organizations can modify, adapt and adopt relevant to the organization's structure, existing policies/procedures and operations. Annex 1 provides a Dhivehi translation of the whistleblowing and reporting policy template.

7.1 Template: Whistleblowing and reporting policy

Guidance Note:

A whistleblowing and reporting policy should include the following:

- ▼ Definition of whistleblowing.
- ▼ Scope of application.
- ▼ Procedures for reporting violations.
- ▼ Handling of reported violations.
- ▼ Protection measures for whistleblowers.

The following policy template sets minimum standards and individual whistleblowing and reporting policies can be expanded as required by the organization or in accordance with the Whistleblower Protection Act 16/2019.

1. Introduction

This whistleblowing and reporting policy is intended to encourage and enable members, employees and associates of (name of the organization) to raise concerns and report internally so that (name of the organization) can address and correct inappropriate and unethical conduct and actions. This policy is also intended to facilitate mechanisms to report violations of (name of the organization's) code of conduct or suspected violations of law or regulations that govern (name of the organization's) operations.

1.1 Purpose:

The purpose of this policy is to facilitate disclosure at (name of the organization) and encourage an open and accountable organization by:

- a.** Establishing a reporting mechanism where members, employees and associates are able to raise concerns internally without retaliation or reprisals.
- b.** Providing guidance on how to report a suspected violation, or related integrity concern, safely and confidentially.
- c.** Establishing measures that (name of the organization) will take to protect the identity of those that report violations/concerns.
- d.** Establishing procedures on how reports are dealt internally.

1.2 Definition:

In this policy “reporting”, “disclosure” and “whistleblowing” is used interchangeably. For the purpose of this policy, whistleblowing is the disclosure of information about an active, previous, attempted or potential wrongdoing or violation or misconduct in (name of the organization).

Whistleblowers are defined as persons who report breaches of (name of the organization) code of conduct, internal policies and law, with the reasonable belief that the information reported is true at the time of reporting.

1.3 Scope of application:

This policy is applicable to all those working for or with (name of the organization) including employees, members, volunteers, consultants and contractors.

Reports and/or concerns can be raised by those who have been subjected to, affected by, witnessed, received information about, or otherwise suspect any violation of (name of the organization’s) code of conduct or law or regulations that govern (name of the organization) operations.

Disclosures must be made within 2 years after the occurrence of the event/incident.

2. General Policy

2.1 Reporting procedure

Reports of suspected violations can be made verbally or in writing to any of the following channels.

- a.** Employees, consultants, contractors and volunteers can report, verbally or in writing to a line manager or supervisor. If it is not comfortable to speak or write to a line manager or supervisor then, they can report using any of the following channels. Members of the organization can also report using the channels outlined below.
- b.** Reports can be made identifiable or anonymously by calling (Phone number) or by e-mailing (e-mail address) or by filling the online form available at (website address).
- c.** Reports can be made to the (name of the organization) Compliance Officer (where applicable).
- d.** Reports can be made to the Chief Executive Officer or the Governing Board of (name of the organization).

2.2 Information to be included in a report

Reports submitted under this policy are encouraged to include as much information as available, including the following suggested details:

- a.** Broad description of the suspected violation.
- b.** Detailed information including details where and how the incident or issue of violation happened, who is involved, how the reporter came to know about it, when it happened, if there are any witnesses, victims or affected persons due to the issue or incident.
- c.** Supporting documents.
- d.** Date of reporting.
- e.** Preferred contact details.

2.3 Handling reports

- a.** A Compliance Officer shall be assigned to receive, assess, investigate and respond to complaints received under this policy. (Note: Compliance Officer may be a board member, the Executive Director or other HR officer designated by the organization).
- b.** Following the receipt of a report through any of the internal reporting channels, (name of the organization's) Compliance Officer will notify the person who submitted a report and acknowledge receipt of the reported violation or suspected violation within 3 working days.
- c.** All reports will be promptly assessed, investigated where warranted, and appropriate corrective or other appropriate action will be taken if warranted by the investigation.
- d.** Regular updates shall be provided to the whistleblower upon request and a final case outcome report shall be provided to the whistleblower.

3. Protection measures for whistleblowers

- a.** Individuals reporting under this policy are protected irrespective of the outcome of the reporting process including those who made inaccurate reports genuinely and reasonably believing that the information disclosed was true at the time of reporting.
- b.** The whistleblower identity and related information are protected from disclosure.
- c.** Whistleblowers are protected from any and all forms of retaliation, disadvantage, or discrimination at the workplace linked to or resulting from whistleblowing. This includes;
 - Dismissal.
 - Removal from duties.
 - Reduction of working hours.
 - Probation.
 - Withholding allowances or decision on such allowances as a punishment.
 - Ban or restriction on promotion or training opportunities.
 - Demotion or restriction on allowance.
 - Issuing threats and warnings and causing loss and damage.
 - Such other activities carried out against the whistleblower.
- d.** The governing board must address and compensate for, where necessary, for any retaliations as per 2.4 (c) against individuals that suffered retaliation for reporting in accordance with this policy.
- e.** Whistleblowers are protected from any legal proceedings for disclosures made in accordance with this policy.

3.1 Anonymous reporting

Reports made anonymously through the internal channels provided by (name of the organization) under this policy will be treated as seriously as non-anonymous reports and in accordance with this policy.

Limitations to anonymous reporting:

- a.** Difficulty in providing comprehensive protection to a person whose identity is unknown.
- b.** Assessments of reports may be limited in scope or focus where it is not possible to communicate or seek further information/clarification from the reporting person.
- c.** The reporting person will not be informed of the progress and outcome of the investigation.

This whistleblowing and reporting policy shall be made available to all members and staff associated with (name of the organization).



8. CONFLICT OF INTEREST POLICY

Conflicts of interest themselves are not evidence of wrongdoing, however, if detected and addressed timely, it can prevent any impropriety and possible disrepute to an organization. Identifying and managing conflicts of interests is a key preventative measure to create a high ethical standard within an organization and its members, and safeguards the organization from being abused or misused for personal gain or purposes that deviate from the organization's legitimate purposes.

Measures to address conflicts of interest in an organization's operations can take the form of a separate conflict of interest policy, as behavioral standards on conflict of interest stipulated as part of the code of conduct, as specific management rules on conflict of interest or as provisions in employment agreements. Whichever format an organization chooses, it is important that guidelines are in place to identify conflicts of interest and ways to address them in order to ensure that instances of actual, potential and perceived conflicts of interest are addressed and opportunities for unethical or corrupt behavior is deterred. As such, the following are some best practice measures that organizations can undertake to regulate conflicts of interest, and mitigate and address such situations.

- Ensure specific layers of the organization such as the governing board members and top management are obliged to declare their past and present interests at the commencement of the term of service, as well as declare any additional interests regularly during their tenure.
- Ensure that the disclosure requirements include declaration of private interests such as business activities and employment, as well as financial interests. Organizations are encouraged to require senior officials to include and disclose the interests, holding and liabilities of spouses and children, in addition to declaration of their own interests.
- Establish clear procedures on how to address conflicts of interest situations including conditions and procedures for recusal from decision making or participation in discussions, restrictions on access to information, and complete withdrawal or transfer from a duty or position from a conflict of interest situation.
- Establish sanctioning or disciplinary action for failure to declare and manage conflicting interests.
- Additional conflict of interest mitigation measures organizations can adopt include restrictions on secondary employment, restrictions in hiring immediate family members, restrictions in procurement, and measures on revolving door.

Whilst it is impossible to address all possible conflicts of interest, the following conflict of interest policy template covers minimum standards on conflict of interest. Annex 2 provides a Dhivehi translation of the conflict of interest policy template.

8.1 Template: Conflict of interest policy

Guidance Note:

A conflict of interest policy should include the following:

- ▼ Definition of what constitutes a conflict of interest.
- ▼ Procedures for disclosing a conflict of interest to the appropriate leaders.
- ▼ A requirement that any individual with a conflict should not be present at or participate in deliberation or vote on the matter.
- ▼ Prohibition against any attempt by an individual to improperly influence the deliberation or voting on the matter related to a conflict.
- ▼ Requirement that the existence and resolution of the conflict of interest be documented in the organization's records.
- ▼ Procedures for disclosing, addressing, and documenting related transactions.

The following policy template sets minimum standards and individual conflict of interest policies can be expanded as required by the organization.

1. Introduction

This policy defines what constitutes conflict of interest, procedures for disclosing conflict of interest, procedures for managing and addressing conflict of interest.

1.1 Purpose:

The purpose of this policy is to protect the interests of (name of the organization) by:

- a.** Ensuring that governing board members, members and employees of (name of the organization) are aware and sensitive to potential conflicts of interest
- b.** Preventing the personal interest of the governing board members, members and employees and independent contractors from interfering with their duties to the organization
- c.** Avoiding any unethical financial, professional or other gain on the part of the individuals.
- d.** Providing guidance on how to avoid and address conflict of interest situations.

1.2 Definition:

For the purpose of this policy, a conflict of interest is any situation where a governing board member, general member or employee is confronted with a real conflict between choosing the duties and demands of their position and their own private interests. The conflict of interest could be potential as well, where a conflict of interest may arise in the future. Conflict of interest situations can also be a perceived conflict of interest.

1.3 Scope of application:

This policy is applicable to the governing board members, general members and employees of (name of the organization).

The “interests of any person associated with (name of the organization)” include the interests of any person with whom they have a close personal relationship, including their spouse, life partner, children, parents or siblings.

2. General Policy

2.1 Duty to disclose

Every person associated with (name of the organization) must avoid or manage any, real, potential or perceived conflict of interest (inter alia by refraining from any decision making or voting on matters subject to a potential conflict of interest), and have a duty to disclose any potential or actual conflict of interest which arises through his/her association with (name of the organization).

2.2 When and how to disclose

- a.** Governing board members and management officials shall declare all their financial and non-financial interests apart from those which could not potentially lead or be perceived as a conflict of interest.
- b.** Governing board members shall declare their financial and non-financial interests by filling a register of interest, at the beginning of their term of service.
- c.** Register of interest of the governing board shall be made available to members and the public.
- d.** Governing board members shall update the register of interest bi-annually.
- e.** In addition to annual disclosure, ad hoc declaration should be practiced when a situation arises.
- f.** Where there are personal safety risks or similar serious concerns regarding full publicity of the register of interest, parts or even the whole of the declaration should be submitted to the Chairperson/President of (name of the organization), and act upon it as appropriate, in confidence.

2.3 Process for managing potential Conflicts of Interest

- a.** Potential conflicts of interest should be identified and declared by the person in potential conflict, or reported by other members of the organization, as soon as they become aware of such potential conflict of interest.
- b.** Such disclosure or report should be made to the Chairperson, Secretary General or another suitable senior officer assigned to report and record this disclosure.
- c.** The evaluation of a potential conflict of interest must be made by the governing board and by uninvolved individuals or the organization's ethics committee. The evaluation may determine the absence of a conflict of interest, or it may lead to the conclusion that the individual should recuse him/herself from participating in the decision or activity with reference to the matter in conflict.
- d.** The Chairperson, and/or the respective Chief Executive is responsible for ensuring that all persons associated with the activities of (name of the organization) are made aware of the policy and procedures regarding conflict of interest.

2.4 Action on failure to disclose

- a.** If the governing board members reasonably believe a general member or staff member failed to disclose an existing or possible conflict of interest, the Chairperson or other members of the governing board shall inform the individual of the rationale for such belief and grant the individual an opportunity to explain the alleged failure to disclose the conflict of interest.
- b.** After hearing the individual's response and investigating further as warranted by the circumstances, the governing board may take appropriate disciplinary action as per the disciplinary rules of (name of the organization).

This conflict of interest policy should be made available to all members and staff associated with (name of the organization).



9. GIFT POLICY

Gifts, hospitality and expenses can be offered to organizations, sometimes disguised as bribes. Hence, it is important for organizations to understand what gifts and other related expenses are appropriate, reasonable and do not interfere in any decision-making process, or provide an advantage to the gift provider or its associate.

A gift policy provides guidelines on how and what gifts can be accepted or offered by an organization, and outlines gifts which are subject to prior review, which can be refused, and the procedures to administer gifts. Gift policies and procedures demonstrate an organization's commitment to self-regulation and accountability and will act as a tool to prevent bribery and attempts to exert undue influence in the decision-making process of an organization.

The following are some of the measures that organizations can undertake which can be adopted as part of a standalone gift policy or included as part of other organizational policies:

- ▶ Ensure that all gifts received or offered do not compromise or run counter to the organization's mission, principles and values.
- ▶ Ensure that the organization has a recording system for gifts that fall within a specified criterion. Include information on the source of the gift.
- ▶ Establish a review process for any gift accepted or offered in order to assess that gifts accepted or offered do not pose any risks to the organization's independence, programs, public perception, and does not result in any potential legal implications or additional expenses to the organization.
- ▶ Maintain consistency and ensure informed decisions are made with regard to the acceptance and offer of gifts.

The following is a template gift policy with minimum standards for a best practice gift policy, which organizations can modify, adapt and adopt relevant to the organization's structure, existing policies/procedures and operations. Annex 3 provides a Dhivehi translation of the gift policy template.

9.1 Template: Gift policy

Guidance Note:

A gift policy should include the following:

- ▼ Define the types of gifts/donations that the organization can accept.
- ▼ Clarify the forms of gifts/donations that can be accepted.
- ▼ Outline how gift acceptance procedures are administered.
- ▼ Assign responsibilities.
- ▼ Clarify when gifts are to be reviewed.

The following policy template sets minimum standards and individual gift policies can be expanded.

1. Introduction

This policy defines under what circumstances a governing board member, general member, employee or volunteer may accept a gift on behalf of (name of the organization) and the procedure to follow when accepting gifts. This policy covers gifts, entertainment, hospitality and other expenses that organizations may receive or offer.

1.1 Purpose:

The purpose of this policy is to set guidelines on accepting and offering gifts on behalf of (name of the organization), establish safeguards to prevent the organization from undue influence and hidden agenda; mitigate reputational damage; and ensure that gifts accepted and offered by the (name of the organization) are appropriate and to protect the interests of (name of the organization).

The purpose of this policy is also to provide guidance to prospective donors and other individuals who may wish to give gifts in various forms to (name of the organization).

This policy will also serve as a guideline to (name of the organization) governing board members, general members, employees, and volunteers involved with accepting or offering gifts.

1.2 Definition:

a. Donor: For the purposes of this policy donors are individuals or organizations that offer gifts.

b. (i) Gifts: A gift is an item of cash or goods or any service of commercial value that is accepted by or offered to an associate of the organization or the organization itself without any return of payment, and accepted on behalf of the organization.

(ii) "Gift" does not include 1) any discount or rebate made in the regular course of business 2) plaques or trophies or souvenirs 3) Attendance at lunches, dinner and other ceremonies that are part of the regular course of business; 4) Financial and material donations and sponsorships that are given as part of a program agreement.

1.3 Scope of application:

This policy is applicable to the governing board members, general members, employees, volunteers and resource persons who are in a position to accept or offer any form of gift on behalf of (name of the organization).

2. General Policy

2.1 (name of the organization) accepts and offers gifts for purposes that will help the organization further and fulfill its mission, support its core programs, as well as special projects.

2.2 All gifts accepted and offered must be in accordance with the overall mission of the organization; its policies and directives; and national laws and regulations.

2.3 A gift register shall be maintained by the organization to record all gifts accepted and offered by the organization.

2.4 The governing board shall assign administrative responsibilities to an assigned officer in order to administratively record gifts; and ensure compliance to this policy.

2.5 This policy shall be made available to all members and employees associated with (name of the organization).

3. Considerations prior to accepting and offering gifts

3.1 Gifts shall be accepted and offered by (name of the organization) after considering, but not limited by the following factors:

- a.** Whether the acceptance or offer of the gift compromises any of the core values or mission of (name of the organization).
- b.** Whether the acceptance or offer of the gift will damage the reputation of (name of the organization) or negatively impact public perception of the organization.
- c.** Whether acceptance or offer of gift would result in any unacceptable consequences for the organization.
- d.** Whether the primary benefit is to (name of the organization) or to the donor.
- e.** Whether the gift is accepted or offered in a form that (name of the organization) can use without incurring substantial expense or difficulty.
- f.** Whether the gift is offered from a controversial donor (e.g., political donor).

3.2 Decisions on the restrictive nature of a gift, and its acceptance or refusal, shall be determined by the governing board, in accordance with this policy.

4. Gifts accepted subject to prior review

The following forms of gifts should be subject to review prior to acceptance:

- a.** Gifts from unknown or unfamiliar donors with which the organization does not have an established relationship.
- b.** Gifts from institutional donors (including foundations, foreign government agencies, corporations, corporate foundations, or for-profit entities) that might not implicitly or explicitly share the core values and mission of the organization.
- c.** Gifts that require review by legal counsel: E.g., securities, tangible personal property, life insurance, or real estate.
- d.** Gifts that could lead to conflicts of interest.
- e.** Gifts that set limitations on the organization in any form.

5. Gifts generally accepted without review

- a.** Gifts from donors that explicitly share or align with the mission and values of the organization.
- b.** Gifts from donors with which the organization has an established beneficial funding relationship.
- c.** Gifts from non-controversial donors.
- d.** However, if the value of the gift stated above in 5a, 5b, 5c, exceeds the value of (to be determined by the organization) the gift shall be reviewed by the governing board.



**Ethics
values**

10. CODE OF CONDUCT

Code of conduct is individual and specific to an organization and requires ownership and endorsement of the code across different stakeholders in an organization. The scope and details of the code of conduct also varies across organizations, depending on its operations, type of organization and culture. The following is a guideline on how to write a code of conduct including definitions of key terms and the key steps organizations need to undertake in the process of developing a code of conduct. Annex 4 provides a Dhivehi translation of the guideline on how to write a code of conduct.

HOW TO WRITE A CODE OF CONDUCT

WHAT IS A CODE OF CONDUCT?

A code of conduct is a policy which outlines the values, standards, guidelines for behavior and best practices that all members and employees and/or third parties acting on behalf of an organization must follow.

The terms code of conduct and code of ethics are sometimes used interchangeably but both these terms have different meanings.

Code of ethics is a standard of moral value by which an organization makes decisions about what is right or wrong, whereas a code of conduct is a body of rules and regulations that explain the acceptable behavior in a specific situation.

WHY IS A CODE OF CONDUCT IMPORTANT?

- ▶ A code of conduct provides a guideline for expected behaviors within the workplace and in business operations of an organization. The code of conduct can be a central reference point when addressing any issue of ethics. Further, building awareness around expected behaviors opens up avenues for dialogue and engagement.
- ▶ A code of conduct demonstrates the organization's commitment to its values and principles, adherence to best practice, thereby contributing to strengthening the organizations' credibility and legitimacy.
- ▶ A code of conduct provides a clear criterion against which the behavior and performance of the management, members, employees, volunteers can be reviewed and can be a useful guide to align actions with the organization's goals or values.

- A code of conduct demonstrates that ethics and standards are important for the organization and will increase the trust of members, employees, volunteers, partners, donors/funders towards the organization. Adherence to ethics and best standards demonstrated by a code of conduct also contributes to an increase in performance of the organization and satisfaction of members, employees and volunteers.
- A code of conduct also acts as a guideline to prevent unethical or corrupt acts which can pose reputational and financial risks for the organization.

STEPS TO FOLLOW WHEN DRAFTING A CODE OF CONDUCT

a. Identify who will be included in the process of developing the organization's code of conduct

Using an existing internal policy making process or practice (if available), determine who will be included in the process from the governing board, management, members, employees, volunteers and other stakeholders in order to develop the code of conduct. You can also extend who you include in the process to donors, beneficiaries and other partners. Broad organization representation and collective input will allow acceptance and effective implementation.

b. Examine past ethical issues, expected standards and behaviors from your stakeholders

Before drafting the code of conduct, consider all of the past ethical issues the organization has experienced and consider possible areas where ethical violations may occur in the course of duty or business. Following consideration of risk areas, identify how ethical conflict and issues can be prevented, what behaviors can be practiced and what standards should be upheld.

c. Outline of code of conduct

Develop a draft code of conduct based on the following sections:

- The **scope** of the code of conduct;
- The **fundamental values and principles** that the organization identifies as most essential to accomplishing the goals and objectives of the organization; this should include values that are key to uphold business integrity such as **integrity, transparency, and accountability**.
- Indicate the organization's expectation that the governing board, management, members, employees **comply with** relevant laws and regulations.

- ▼ **Disciplinary action on violations** should be included. Disciplinary action can include verbal warnings, written warnings, suspension, or termination. Disciplinary action rules prescribed in relevant employment laws and regulations can be used as guidelines in taking disciplinary action against individual associates of the organization who are not employees.
- ▼ **Procedure on reporting violation of the code** should be included. Reporting procedure guides members, employees, volunteers and other stakeholders on how to report violations of the code of conduct.
- ▼ Identify the compliance areas you will include in your code of conduct. The following is a suggested list of **compliance areas** that can be included:
 - ▷ Conflicts of interest.
 - ▷ Asset protection.
 - ▷ Gift policy.
 - ▷ Organizational culture.
 - ▷ Whistleblowing and reporting.
 - ▷ Confidentiality.
 - ▷ Proactive disclosure.
 - ▷ Sexual and general harassment and discrimination.
 - ▷ Substance use.
 - ▷ Privacy policy.
 - ▷ Equal opportunity.

Once you have chosen the areas to include, outline each section with the information you feel is most appropriate to your organization.

d. Consultation

Once the outline is developed, a consultation should be held with members and/or employees in order to provide them an opportunity to comment and deliberate on its contents. An in-house committee of representation from the governing board, members and employees can also be mobilized to develop and review the code of conduct. Where possible, beneficiaries and other stakeholders can also be invited to provide their input.

e. Communicate the code of conduct

The code of conduct should be communicated to all members, employees and volunteers. The code of conduct can be communicated in the form of sessions during induction/orientation programs or can also be part of a membership application form.



11. SELF-ASSESSMENT CHECKLIST

The following is a self-assessment checklist which organizations can use as a tool to assess their own compliance to business integrity standards and policies, and help to prioritize which areas in their operations need better compliance to business integrity standards.

Section A. Leadership and Commitment		Yes	No	Partly	Planned	N/A
1	Does the organization's leadership demonstrate explicit and visible support and commitment to integrity standards and anti-corruption in the organization's operational plans?					
2	Is the organization's leadership required to commit to business integrity standards in its Articles of Association /Hingaa Gavaaidhu/Rules of Procedure?					
3	Does the organization's President/CEO's job role have the responsibility of adherence to business integrity standards and establishing business integrity programs?					
4	Does the management provide resources for the implementation of any business integrity program?					
Section B. Oversight and Governance		Yes	No	Partly	Planned	N/A
5	Is the organization structured to govern itself autonomously and equipped to control its own activities?					
6	Are the organization's vision, policies and activities determined by any other organization (donor agencies, partner organization, public body etc.)?					
7	Does the governing board monitor the organization's program and activities to ensure compliance and effectiveness?					
8	Is the organization under any external oversight including review or evaluations (e.g., audits and assessment) by government or other affiliated bodies?					
9	Does the governing board evaluate the performance of the CEO and ensure that he/she has the support needed to advance the goals of the organization?					
10	Is there a legal department or legal officer to ensure compliance to laws and review the organization's governing and other legal documents?					

Section C. Human Resource Management		Yes	No	Partly	Planned	N/A
11	Does the organization have a written recruitment policy?					
12	Does the governing board decide on the need to recruit for a post?					
13	Are vacant positions for staff and volunteers publicly advertised?					
14	Are candidate CVs, application forms evaluated and interviews conducted by a panel?					
15	Does the organization carry out appropriate due diligence on appointing the governing board?					
16	Does the organization carry out appropriate due diligence on employees?					
17	Are you confident that corrupt or ethical behavior by staff or members will be sanctioned if found guilty in your organization?					
Section D. Internal Control and Audit System		Yes	No	Partly	Planned	N/A
18	Are financial records accessible for members of the organization?					
19	Are income and expenditure reports and activity reports prepared annually?					
20	Does the organization undertake annual auditing?					
21	Is the organization's auditing done by an external auditor?					
22	Are discrepancies or irregularities identified in audits addressed?					
23	Is there segregation of duties among different people to reduce the risk of error or inappropriate action, such as responsibilities for authorizing transactions, recording transactions (accounting) and handling the related asset (custody)?					
Section E. Procurement		Yes	No	Partly	Planned	N/A
24	Does the organization have a written policy or procedure for procurement?					
25	Is the organization required to comply with procurement rules set by funders/donors in addition to internal procurement policy/procedure?					

Section E. Procurement		Yes	No	Partly	Planned	N/A
26	Is there a procurement department or function?					
27	Has the organization procured goods or services using competitive bidding?					
28	Is there a mechanism to report noncompliance to procurement policies and procedures?					
29	Are standard form contracts used?					
Section F. Budgeting and Revenue		Yes	No	Partly	Planned	N/A
30	Does the governing board approve the organization's annual budget?					
31	Are internal financial statements regularly prepared and provided to the organization's governing board?					
32	Does the management undertake annual budget planning, budget forecasting, and performance reviews?					
33	Are discrepancies between budgeted expenses and actual expenses, and budgeted revenues and actual revenues identified and reported to the governing board?					
34	Are there multiple sources of revenues for the organization?					
35	Are funds from the government, and other sources clearly demarcated?					
36	Are sources of funds published in your annual financial reports?					
37	Is information on sources of funds available on request?					
38	If the organization collects fees from members, are there procedures in place to ensure that collected fees are properly accounted for?					
Section G. Asset management		Yes	No	Partly	Planned	N/A
39	Are there policies or procedures to record and track items purchased and used?					
40	Are there procedures to ensure that the organization's assets (telephones, printers, vehicles etc.) are used only for its intended purpose?					

Section H. Fundraising and Resource Mobilization		Yes	No	Partly	Planned	N/A
41	Does the organization have a fundraising policy or guideline?					
42	Are there any requirements or guidelines in accepting funds?					
43	Does the organization only accept funding consistent with its mission and core principles?					
44	Are there controls and procedures to ensure that political and charitable contributions are not used as a subterfuge for corruption?					
45	Are you required to report to donors on the use of donor funds?					
46	Are there safeguards to ensure that the organization's fundraising is free of improper motive, inappropriate conduct, unreasonable reward, or personal benefit?					
47	Does the organization have a monitoring system in place to ensure improper or unethical use of funds does not occur, such as protection against double funding for one project or diversion of dedicated funds to uses other than for which funds were received or approved?					
Section I. Gift Policy		Yes	No	Partly	Planned	N/A
48	Does the organization have a written policy covering gifts?					
49	Are there procedures and controls in offering and accepting gifts, hospitality and other expenses by members and employees?					
50	Are gifts, hospitality and expenses given or received by the organization documented?					
Section J. Anti-Corruption Policy/Program		Yes	No	Partly	Planned	N/A
51	Does the organization have an anti-corruption program/policy?					
52	If there is no anti-corruption policy/program, are there mechanisms or activities/initiatives undertaken by the organization to promote integrity and prevent corruption?					

Section K. Code of Conduct		Yes	No	Partly	Planned	N/A
53	Is there a written code of conduct?					
54	Does the code cover or apply to the governing board, general members, employees?					
55	Is the code shared and communicated to everyone including the governing board members, employees and volunteers?					
56	Does the code define prohibited practices?					
57	Does it outline disciplinary actions for violations and non-compliance?					
Section L. Conflict of Interest		Yes	No	Partly	Planned	N/A
58	Is there a written conflict of interest policy?					
59	Do board members and top management have to disclose all potential and actual conflicts of interests?					
60	Does the governing board and top management provide a written conflict of interest statement or complete a register of interest at the outset of each term of service?					
61	Does the organization provide loans to its members and/or employees?					
62	Is there a policy describing the terms of the loans?					
63	Are the terms of the loans available to members?					
64	Is the information regarding loans disclosed in the organization's full financial reports?					
65	Do employee contracts stipulate conflict of interest provisions?					
Section M. Reporting systems and whistleblowing		Yes	No	Partly	Planned	N/A
66	Does the organization provide secure and accessible channels through which employees and external partners can raise concerns and report violations (whistleblowing) in confidence and without risk of reprisal?					
67	Are there measures to prevent singling out and prejudice against persons who, on good faith, report actions that could imply abuses or violations of integrity norms?					

Section N. Risk assessment		Yes	No	Partly	Planned	N/A
68	Does the organization conduct standard risk assessment to identify risks of corruption?					
69	Does the organization have plans or measures in place to mitigate risks of corruption?					
Section O. Access to information and transparency		Yes	No	Partly	Planned	N/A
70	Does the organization annually prepare and make publicly available information on its program and services?					
71	Is the organization's annual activity/financial report available to the public?					
72	Does the organization's published annual activity/financial report include information on use of funds?					
73	Are the names of the organization's governing board and management staff made available to the public?					
74	Does the public have a method to communicate with the organization?					
75	Is there someone assigned by the organization to assure the organization is complying with laws regarding disclosure of information to the public?					
Section P. Communication and training		Yes	No	Partly	Planned	N/A
76	Does the organization have a training policy?					
77	Does the organization conduct induction/orientation program to new employees and board members or members, so that they understand the organization's code of conduct, values and the sanctions procedure in the event of a violation?					
78	Does the organization provide training specially for those staff/members involved in financial management and procurement?					
79	Is there any specific ethics and compliance training program in your organization?					
80	Does the organization assess training activities periodically for effectiveness?					

ANNEXES



סדרת ספרים שפרסם משרד החינוך בשיתוף עם משרד החינוך הלאומי ומועצה אזורית חבל השרון, המכילה את כל החומרים הנדרשים ללימודי התנ"ך והאגדה.

החומרים מיועדים לשימוש בחדרי הלימודים ובמסגרות חינוכיות אחרות.

1.2 קריאה

הקריאה היא "הקריאה", "הקריאה" ו"הקריאה" – כל אחת מהן היא חלק מהקריאה הכללית. הקריאה היא חלק מהקריאה הכללית, והיא חלק מהקריאה הכללית. הקריאה היא חלק מהקריאה הכללית, והיא חלק מהקריאה הכללית.

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1.3 רשימת קריאה

הקריאה היא חלק מהקריאה הכללית, והיא חלק מהקריאה הכללית. הקריאה היא חלק מהקריאה הכללית, והיא חלק מהקריאה הכללית. הקריאה היא חלק מהקריאה הכללית, והיא חלק מהקריאה הכללית.

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2. הקריאה

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