Anti-corruption Policy Directive

Background and Objectives

The German Federation of the Blind and Partially Sighted = *Das Deutsche Blindenhilfswerk (DBHW)*, uses donations, public and private grants, inheritances, and monetary penalties to implement charitable projects for the blind, visually impaired, and people at risk of blindness. The DBHW is aware of the responsibility entailed in its handling these funds and is transparent in its accountability to both donors and the public alike. Several auditing bodies, both statutory and voluntary, review the organization's work on a regular base.

It is a key concern for the DBHW that the funds available for project work are accessible and that they are used in accordance with its statutes. Due to flat hierarchies and low-threshold structures, employees are actively involved in processes and have comprehensive insight into workflows. To this end, the DBHW maintains long-standing business and project relationships based on trust and transparent co-operation and communication. The guidelines developed in the directive are intended to raise awareness of potential risks and provide clear decision-making support for all employees, volunteers, and partner organizations. In so doing, the DBHW also emphasizes its transparent working methods and takes a stand against fraud and corruption. [1]

Definition and Types of Corruption

This policy directive follows Transparency International's definition of corruption: “Corruption is the abuse of entrusted power for private gain or advantage.” Corruption always takes place in secret. It can be active or passive and involves at least two parties.

Corruption most commonly takes the following forms[2]:

1. Cash payments

Cash payments are the simplest form of bribery. These can be direct handovers of money, but also payments for commissions or expert opinions for which no actual service was provided. This can happen directly or indirectly when third parties issue inflated invoices for their services.

2. Gifts and invitations

Gifts for guests on project trips or invitations for coffee or a drink are part of maintaining relationships and mutual appreciation. However, in addition to monetary means, gifts or invitations can also be used to exert influence. These can be valuable gifts that can also be used privately, or invitations to restaurants or events, especially when the host is not present in person.

3. Conflicts of interest

Conflicts of interest occur when personal or emotional factors influence the objective performance of work for the organization. This can include, for example, commissioning services or purchasing goods from people known personally.

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[1] This policy directive is based on the German Federal Government's directive on corruption prevention in the Federal Administration dated 30 July, 2004.

[2] Transparency International Deutschland e.V.: management principles for small and medium-sized enterprises to combat corruption, June 2014.

4. Bribes

Bribes enable or expedite services to the payer. This could include, for example, the issuance of a visa or the import of aid supplies. In some countries, these small payments are part of normal business practice.

5. Fraud and embezzlement

This area covers criminal acts that lead to personal gain. This includes the falsification of documents, private theft of professional property, or making false statements.

Scope and Forms of Action to Prevent Corruption

The guideline applies to all DBHW employees and volunteers and is communicated in writing when they start work or are elected to office. The guidelines are communicated to project partners and, where appropriate, set out in writing in project agreements.

The areas of work at the DBHW which are at risk are project work and the awarding of contracts and services for the organization.

Transparency and Control

Proper accounting is a crucial prerequisite of preventing corruption. The DBHW works transparently and presents its work both to its members and to the public. In addition to several statutory controls (cash audit, administrative board supervision), the DBHW voluntarily submits its work to scrutiny by further controlling bodies i.e. auditing and GTZ: *Deusches Zentralinstitut für soziale Fragen* = Seal of approval from the German Central Institute for Social Issues. The principle of control by two or more persons applies to all payments. This applies both to the DBHW and to its partner organizations.

Analysis and Minimization of Risk

When planning projects, the DBHW conducts an analysis of the risks and the minimization thereof together with the project partners. For more comprehensive projects, partial payments are transferred and detailed invoices with the corresponding receipts are obtained. The appropriateness of the payments is checked on the basis of experience or comparisons. For individual payment transactions, attempts are made to settle accounts directly with the supplier or service provider. Donations in kind are primarily handed over directly.

Commissioning

The DBHW obtains comparative quotes for services and purchases and documents these. Higher expenditures and the establishment of new business relationships are decided jointly by the office and the board.

Careful Selection of Employees and Partner Organizations

Employees and volunteers, especially in high-risk areas of work, are given a professional and thorough introduction to their areas of responsibility. Project partners are assessed in terms of their transparency and internal control mechanisms, as well as their registration status.

Rules of Conduct

1. Bribes and payments, both active and passive, are strictly prohibited, even if they are supposedly to the advantage of the DBHW (zero tolerance principle).

2. Invitations and gifts must not influence decision-making in any way. The upper limit for invitations or gifts is €50. If the value exceeds this amount, the appropriateness of accepting the gift should be discussed with a superior within the association. Payment for charitable work and associated communication with the donors should also be considered. It is recommended that gifts received in a professional context be made available to the entire workforce. All gifts and invitations from the DBHW are documented and accounted for with receipts.

3. Personal connections within the organization or to cooperation partners must always be disclosed.

4. The payment of bribes is not permitted. If such payments are unavoidable or employees feel compelled to make them, the matter must be discussed with the respective project partner and the board of directors, and ways of avoiding similar situations in the future must be discussed.

5. The non-professional use of office supplies or technical equipment must be discussed with colleagues and, if necessary, recorded in writing.

6. If corrupt activity is suspected within the organization, the next uninvolved superior is the first point of contact. All whistleblowers are guaranteed protection and anonymity.

Starting Date

The policy directive shall take effect upon approval by the Executive Board and the Board of Directors on December 18, 2025, and shall be reviewed regularly.