



**MINISTRY OF FOREIGN AFFAIRS
OF DENMARK**

MAY 2023

ANTI-CORRUPTION POLICY



Zero tolerance towards corruption

The Ministry of Foreign Affairs of Denmark is a globally operating organisation. We work for Denmark's interests and values in relation to the surrounding world. Staff are in contact with numerous other public organisations, NGOs, ordinary citizens, commercial companies and other counterparts all over the world. The Ministry of Foreign Affairs, and thus Denmark, actively supports the international fight against corruption and advises partners on how to avoid corruption.

In the Ministry of Foreign Affairs, we are determined to maintain the highest standards of integrity and work ethics among our staff and across all areas of activity. We therefore maintain a policy of **zero tolerance** towards corruption in all its forms in Denmark as well as abroad. The zero-tolerance in connection with Danish development aid is explained in more details on Danida's [website](#).

This Anti-Corruption Policy and its Code of Conduct are applicable to all staff working in the Ministry of Foreign Affairs in Copenhagen and at Danish Missions. Its purpose is to ensure and support behaviour and work ethics characterised by the highest standards of personal and organisational integrity, both internally and externally with our many different partners.

This Anti-Corruption Policy provides guidance to staff on their required conduct when confronted with corruption, corrupt practices or corrupt propositions, and when working to prevent corruption.

What is corruption?

Corruption is defined as the misuse of entrusted power for private gain. It affects everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority, it threatens the stability and security of societies, and it undermines democratic institutions and values.

This definition corresponds to the concept of corruption in the Danish Penal Code and in international anti-corruption conventions, and it covers situations involving the taking and giving of bribes as well as other types of active or passive corruption.

Corruption is best known in the form of bribery, fraud, embezzlement or extortion. However, corruption does not exclusively involve money changing hands; it may also in-

clude providing services to gain advantages, such as favourable treatment, special protection, extra services or quicker case processing.

Anti-Corruption: Code of Conduct

All staff of the Ministry of Foreign Affairs in Copenhagen and Danish Missions will respect and promote the principles of the Code of Conduct presented below.

1. Conflict of interest

We will avoid any conflict – real or potential – between our personal interests and the interests of the Ministry of Foreign Affairs.

Conflicts of interest arise from situations in which a member of staff has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of his or her official duties. Private interests include any advantage to oneself or one's family, close relatives, friends and persons or organisations with which one has or has had business or political relations. When faced with a potential or actual conflict of interest, staff are required to promptly inform their superiors.

2. Bribery

We will not give or accept bribery in any form.

Bribery is the act of offering, giving (active bribery), receiving, soliciting or accepting (passive bribery) something of value with the purpose of influencing the action of an official in the performance of his or her public or legal duties. Bribery is a criminal offence in Denmark.

3. Extortion

We will not for private purposes seek to influence any person or body by using our official position or by using force or threats.

Extortion occurs when a public official unlawfully demands or receives money or property through intimidation. Extortion may include threats of harm to a person or his/her property, threats to accuse him/her of a crime/illegal act, or threats to reveal embarrassing information. Some forms of threat are occasionally singled out for separate statutory treatment under the designation "blackmail." Extortion is a criminal offence in Denmark.

4. Fraud

We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.

Fraud is the use of deception with the intention of obtaining an advantage (financial or otherwise), avoiding an obligation or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behaviour, practising trickery or acting under false pretences. Fraud is a criminal offence in Denmark.

5. Embezzlement

We will not misappropriate or otherwise divert property or funds entrusted to us.

Embezzlement is the misappropriation or other diversion of property or funds legally entrusted to someone by virtue of his or her position. Embezzlement is a criminal offence in Denmark.

6. Gifts

We will not give, solicit or receive directly or indirectly any gift or other favour that may be seen to influence the exercise of our function, performance of duty or judgement. This does not include conventional hospitality or minor gifts.

In the context of corruption, a gift is a financial or other benefit, offered, given, solicited or received in the expectation of receiving a benefit in return. Gifts and hospitality may be in themselves a manifestation of corrupt behaviour. They may be used to facilitate corruption, or may give the appearance of corruption. Gifts may include cash or assets given as presents, and political or charitable donations. Hospitality may include meals, hotels, flights, entertainment or sporting events.

As a general rule, staff should not receive gifts or other advantages. However, in observing and respecting local hospitality conventions, small gifts may be accepted. Further details are available in the Ministry of Foreign Affairs's policy on gift and the Danish Code of Conduct in the Public Sector from 2017 (only in Danish).

7. Nepotism and favouritism

We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.

Nepotism is favouritism shown to relatives or friends without regard to merit. Relatives or friends are treated favourably based on the close personal relationship alone rather than on a professional and objective assessment of their skills and qualifications.

8. Reporting corruption cases

We will report any evidence or suspicion of breach of this Code of Conduct.

All staff are obliged to familiarise themselves with the Code of Conduct and respect its principles. They are obliged to report any evidence or suspicion of breach of the Code to their superiors.

Openness and transparency is the rule

Maximum openness and transparency is essential when fighting corruption and information concerning the public sector is generally accessible to the general public in accordance with the Danish Public Administration Act and the Danish Act on Access to Public Administration Files.

The Ministry ensures openness and transparency towards the public and its partners through the Ministry's own website with focus on and links to:

- The Ministry's "[Economy & Results](#)"
- The Ministry's [anti-corruption policy](#)
- [The Ministry's whistleblower mechanism](#)
- Danida's site on "[Fraud and Corruption](#)", where actual corruption cases in relation to development aid are accessible
- The Ministry's [Aid Management Guidelines](#)

Internally, the Ministry ensures that all staff are familiar with the Anti-Corruption Policy through:

- A dedicated [anti-corruption site](#) on the intranet Umbrella
- Internal instructions - e.g. regarding the Ministry's gift policy
- Relevant training and instruction

Where and how to report corruption

Zero tolerance on corruption entails that all staff upon suspicion or awareness of specific cases of corruption, are obliged to immediately report the matter in the following way:

- Cases, involving Ministry staff (in the Ministry and at the Missions) should immediately be reported to immediate superior or the Ministry's whistleblower mechanism.
- Cases in relation to external partners receiving Danish development assistances, should be reported to the Department for Financial Management and Support (FRU) via fru@um.dk
- Cases in relation to Danish companies abroad should be reported to the Ministry's Legal Department via jtk@um.dk.
- Cases in relation to the Ministry's partners, i.e. service providers and consultants should immediately be reported to immediate superior.

Upon suspicion or knowledge of specific cases of corruption, such as bribery, the decision to notify Danish authorities, including possibly reporting to the police, is taken by the Ministry of Foreign Affairs in Copenhagen on the basis of the available information. This applies to all cases regardless of how the information came into the Ministry's possession.

Implementation of the Code of Conduct

The staff of the Ministry of Foreign Affairs will regularly take part in relevant anti-corruption training.

The Code of Conduct is supplemented by guidelines and instructions targeted at specific policy areas. Hence, Danida and the Trade Council have for several years had guidelines within development cooperation or export promotion, respectively, and worked actively to fight corruption.


Anti-Corruption Code of Conduct

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2. We will not give or accept bribery in any form.
3. We will not for private purposes seek to influence any person or body by using our official position or by using force or threats.
4. We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.
5. We will not misappropriate or otherwise divert property or funds entrusted to us.
6. We will not give, solicit or receive directly or indirectly any gift or other favour that may influence the exercise of our function, performance of duty or judgement. This does not include conventional hospitality or minor gifts.
7. We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.
8. We will report any evidence or suspicion of breach of this Code of Conduct.

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