

FONDATION MAROY |
MAROY FOUNDATION

Zero-Tolerance of Corruption Policy

Maroy Foundation adheres to international standards regarding corruption: We adhere to ISO 37001 which dictates the standard for anti-corruption compliance. We have a zero-tolerance policy towards any such form of corruption within our organisation, and we regularly check to the best of our ability to ensure that our partners and donors have not attained any wealth or goods donated to the Foundation via corrupt means.

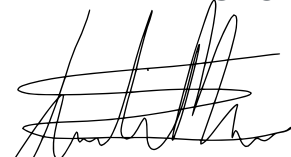
Of course, however, bilateral donors often use “zero tolerance for corruption policies” to signal a tough stance against corruption, but staff often experience a lack of clarity on how to apply these policies in practice. Some multilateral development banks have had long experience in applying zero tolerance to corruption policies. Their experience indicates that the strict application of these policies—that is, the full investigation, prosecution, and sanction of all instances of corruption, no matter how minor—is usually not feasible. Zero tolerance policies should translate not to zero appetite for risk, but rather to adequate risk management processes (Francesco De Simone and Nils Taxell Bergen: Chr. Michelsen Institute (U4 Brief 2014:2) 4 p). Such risk management is often difficult, but we undertake several steps to ensure there is no corruption in our organisation. These include:

- **We take corruption seriously from the highest level in our organisation:** We have a risk assessment of our operations and what bribery and corruption looks like in our industry, especially in an African context, and further in a Congolese context. We apply these learnings to our business allowing us to manage risk.
- **We assess risk across all of our operations:** We are mindful that it may not necessarily be our largest unit of core business activity (Maroy Foundation Hospital) that is generating greater risks, but that our smaller activities around the periphery, such as our EEWYEL Program, are also monitored and accounted for.
- **We hire the best talent, not family:** We are a private NGO born out of a father and son partnership serving as the Executive Director and Chair of the Board and the President and CEO respectively, yet not one employee of the Foundation is a family member. All of our employees are thoroughly vetted through a rigorous interview process and background check. We will never indulge nepotism.
- **We are aware that honesty leads to long-term success:** We are aware that companies that run their operations on a sustainable and positive, values-based model with good corporate governance are more successful. This allows us to ultimately better run our Foundation. Operating with an ethical business model and having good management of bribery and corruption risks minimises the chance of something going wrong and a bribery and corruption scandal arising.
- **We keep clear and backed-up records and financial statements of all donations, gifts, incomes, and outgoings:** This allows us to present our zero-corruption on demand, allowing us to build and maintain a relationship of trust with our partners and donors.

Approval for this statement

This statement was approved by the Board of Directors on 14th July 2019.

Justin Maroy
President & CEO



16th July 2019