



Geneva, 9 June 2025

SERVICE ORDER No. 25/10

POLICY AGAINST FRAUD AND CORRUPTION

(This Service Order abrogates and replaces Service Order 19/09)

I Definitions

1 The following definitions apply to this Policy:

- a) "*ITU Personnel*": means a) ITU elected officials; b) ITU appointed staff (including staff members holding a short-term contract as well as those on secondment; c) interns; d) junior professional officers; e) external professionals working as consultants under a Special Service Agreement (SSA) with ITU.
- b) "*Fraud and corruption*" means engaging in any of the following practices, as well as actions taken to instigate, aid, abet, attempt, conspire or cooperate in doing so:
 - i) *Fraudulent practice*: Any act or omission whereby an individual or entity knowingly misrepresents or conceals a fact a) in order to obtain an undue benefit or advantage or avoid an obligation for himself or herself or for a third party, and/or b) in such a way as to cause another individual or entity to act, or fail to act, to his or her detriment.
 - ii) *Corrupt practice*: The offering, giving, receiving or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party.
 - iii) *Collusive practice*: An arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.
 - iv) *Coercive practice*: Impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of said party to influence improperly the actions of that party.
 - v) *Obstructive practice*: Acts or omissions intended to materially impede the exercise of contractual rights of audit, investigation and access to information, including destruction, falsification, alteration or concealment of evidence material to an investigation into allegations of fraud and corruption.
 - vi) *Unethical practice*: Conduct or behaviour that is contrary to the ITU Code of Conduct or the UN Supplier Code of Conduct, such as those relating to conflict of interest, gifts and hospitality, and postemployment provisions. A conflict of interest occurs when, by act or omission, a staff member's personal interests interfere with the performance of his or her official duties and responsibilities or

with the integrity, independence and impartiality required by the staff member's status as an international civil servant.

- 2 A non-exhaustive list of fraudulent and corrupt practices appears in **Annex A** hereto.

II Key Principles

3. Three key principles guide this Policy:

- a) **ITU has "Zero Tolerance" for any type of fraud and corruption.** Any such practice is unacceptable and, if established, amounts to misconduct which may result in administrative action, including disciplinary action pursuant to the relevant provisions of the ITU Staff Regulations and Staff Rules. ITU will ensure that any individuals or entities found to have engaged in such behaviour will be held accountable to the fullest extent possible under the relevant legal framework. Respecting standards of due process, the organization will ensure swift action, as well as proportionate and adequate sanctions on individuals or entities found to have engaged in such behaviour. ITU will also undertake appropriate efforts to recover defrauded resources.
- b) **ITU is committed to a culture of deterrence and prevention.** Measures to prevent and deter fraud and corruption are more effective and less costly than those required to detect and respond to such activities after they have taken place. The present Policy promotes active prevention and detection efforts in the organization's administrative procedures, operational systems and internal controls.
- c) **Reporting is an obligation; protection is a right.** It is the obligation of all ITU personnel to report any suspected fraud and corruption as per the procedure outlined in ITU's Policy for Reporting Misconduct and Protection against Retaliation ("Whistleblowing"). Where they have done so ITU personnel have the right to be protected from adverse action related to their act of reporting.

III Anti-Fraud and Corruption Culture

- 4 ITU is committed to ensuring that opportunities for committing acts of fraud and corruption are reduced to the lowest possible level. To achieve this, ITU will promote an anti-fraud and anti-corruption culture through measures that may include:

- Providing training and briefings to managers and other personnel on ethical obligations and good financial practices;
- Developing and maintaining effective controls to prevent fraud and corruption;
- Reviewing contractual arrangements with partners, vendors, suppliers and other parties in a commercial relationship with ITU to incorporate provisions referencing ITU's zero tolerance policy for fraud and corruption;
- Ensuring that, if acts of fraud and corruption occur, an investigation takes place in accordance with the ITU Investigation Guidelines;
- Taking appropriate disciplinary action in all cases, within ITU's disciplinary authority and, where appropriate, legal action; and
- Reviewing systems and procedures to prevent similar cases of fraud and corruption.

IV Reporting Fraud and Corruption; Protection Against Retaliation

5 ITU personnel who have information or evidence that fraud or corruption has occurred have a duty to report it as per the procedure outlined in ITU's Policy for Reporting Misconduct and Protection against Retaliation ("Whistleblowing").

6 Protection against retaliation is governed by the relevant sections of ITU's Policy for Reporting Misconduct and Protection against Retaliation ("Whistleblowing").

V Confidentiality

7 The confidentiality obligations mentioned in Section 4 of ITU's Policy for Reporting Misconduct and Protection against Retaliation ("Whistleblowing") also apply to this Policy.

VI Roles and Responsibilities

8 All ITU personnel play a critical role and are responsible for safeguarding ITU resources and maintaining the organization's reputation.

9 Specific roles and responsibilities under this Policy are as follows:

- Executive leadership

The Secretary-General, as the executive head of the ITU secretariat, holds the primary responsibility of ensuring that ITU maintains a culture of ethics, transparency and accountability. This includes sending a clear message to internal and external parties that fraud and corruption will not be tolerated.

- Chief, Financial Resources Management Department

The Chief, Financial Resources Management Department is accountable to the Secretary-General for establishing and maintaining a sound system of internal control that supports the management of financial resources. This system of internal control is designed to respond to, and manage, the financial risks faced by ITU.

- Chief, Human Resources Management Department

The Chief, Human Resources Management Department is responsible, in coordination with the relevant hiring managers, for ensuring that ITU performs the necessary due diligence prior to engaging personnel. He/she also ensures that there are robust recruitment processes in place.

- Supervisors and/or managers

The day-to-day responsibility for the prevention and detection of fraud and corruption rests with line managers. Following the example of the elected officials, they are responsible for also promoting a "Tone at the Top" to reflect the organization's zero tolerance approach to fraud and corruption. This includes demonstrating that they are vigilant for fraud and corruption risks and take proactive steps to prevent and identify any such potential practices. In particular, supervisors and managers at all levels are expected to:

- Raise awareness and knowledge of the risk of fraud and corruption with their personnel;

- Perform risk assessments to identify which ITU assets, programmes, activities, and interests are exposed to fraud and corruption risks; assess the level and impact thereof;
 - Select the most appropriate risk response option to accept, reject, transfer or mitigate risk through the design and implementation of preventative and detective controls;
 - Monitor and supervise the performance, working methods and outputs of their personnel to ensure that they are conducting themselves in ways that meet the highest ethical and professional standards; and
 - Seek guidance, where necessary, from unit chiefs/heads, deputies to the Directors, and/or elected officials, as well as the Oversight Unit and/or the Ethics Office.
- All ITU personnel
- The responsibilities of all ITU personnel include adhering to the ITU Code of Ethics and the standards set forth in ITU regulations, rules and administrative issuances and/or the provisions of contractual agreements entered into with ITU as applicable to them based on their contractual status, among other things, by:
- Acting at all times in accordance with the highest standards of integrity;
 - Under no circumstances engaging in, condoning or facilitating, or appearing to condone or facilitate, any fraud or corruption;
 - Refraining from participating in any situation that may give rise to any conflict of interest and promptly disclosing circumstances where there is a potential conflict of interest or the appearance thereof;
 - As stewards of public resources, avoiding any use of the funds, resources and/or assets of ITU that is contrary to the Policy;
 - Detecting, preventing and reporting any fraud and corruption, as well as any attempts thereof, in accordance with the Policy;
 - Performing due diligence before entering into agreements with third parties, and exercising due care in managing the funds, resources and/or assets of ITU or entrusted to ITU, applying established risk control mechanisms to mitigate the risk of fraud and corruption;
 - Respecting post-employment restrictions, including the prohibition on attempts to unduly influence decisions of the organization in the interest or at the request of a third party with a view to seeking an opportunity to be employed by such third party. In this regard, it should be noted that ITU's General Conditions of Contract for the Provision of Services and Goods provides: *"Neither ITU nor the Contractor shall, during the period of one year following the completion of all Contractor's obligations, either employ or consider employment of any member of the personnel of the other Party without the prior written approval of the latter."*
 - Maintaining the utmost care in handling confidential or otherwise sensitive information and refraining from unduly disclosing confidential or otherwise sensitive information to internal as well as external parties; and
 - Complying with any mandatory training established under the Policy.

In addition, all ITU personnel with delegated authority for the use of ITU resources are responsible for ensuring compliance with established procedures and acting prudently and ethically to provide reasonable assurance for the prevention and detection of fraud and corruption. Particular attention must be paid to the protection of passwords and financial documents.

– Oversight Unit

Pursuant to the ITU Internal Oversight Charter, *"the mission of the OU is to provide independent and objective audit, investigation and evaluation services designed to add value and improve the Organization's operations and to enhance the integrity and reputation of the Organization across the whole ITU"*.

– The Ethics Office

The Ethics Office is responsible for increasing ITU personnel awareness on the core values and principles of ITU and the United Nations and the importance of ethical standards and expected behaviours. The Ethics Office also provides advice and guidance to ITU personnel, at their request and in confidence, on conflicts of interest and other ethics-related issues.

– The External Auditor

Pursuant to the ITU Financial Regulations and Financial Rules, the External Auditor is responsible for bringing fraud cases to the attention of the Council.

VII Entry into Force

10 This Service Order enters into force on the date of its promulgation.

Annex A: Examples of fraud and corruption practices

Examples include, but are not limited to, the following actions:

- Forging documents, preparing false entries in ITU systems or knowingly making false statements to obtain a financial or other benefit for oneself or another/others;
- Colluding with, or participating in any other anti-competitive scheme between, suppliers during a procurement process to influence the contract award by ITU;
- Providing information that the claimant knows to be false in relation to dependents, education grants, rental subsidies, home leave travel or another entitlement to gain a financial benefit;
- Forging the signature of an ITU staff member or forging a document purporting to be from ITU to induce a party outside ITU to act;
- Using an information technology identity or password other than one's own, or creating false identities/passwords, without consent or authority, to manipulate ITU processes or cause the approval or denial of actions;
- Accepting without authorization gifts or hospitality such as meals or entertainment from a supplier;
- Misrepresenting ITU employment status to obtain a benefit from a governmental or private sector entity;
- Failing to disclose a financial or familial interest in a business or outside party while participating in the award/management of a contract to the benefit of that business or outside party;
- Covering the cost of personal travel as part of official travel;
- Making misrepresentations, including educational credentials or professional qualifications, on a personal history form in the context of a job application;
- Falsifying documents, knowingly making false statements or preparing false entries in ITU systems or other deceptive acts to the detriment of someone or seeking to disfavour, or to discredit a person, programme or the organization;
- Submitting claims for expenses incurred by partners that were known as being ineligible or unsupported;
- Misusing assets, commodities and other items or knowingly allowing implementing partners and other third parties to do so;
- Soliciting or accepting a bribe/favour to award a contract to a supplier; and
- Impairing or harming, or threatening to impair or harm, directly or indirectly a colleague or supervisor to improperly obtain a favourable performance appraisal.
