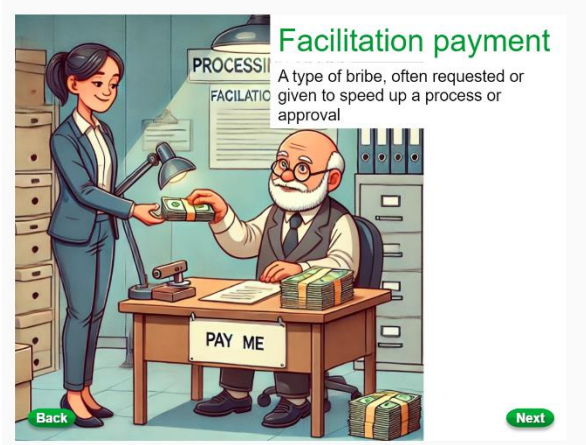


Anti-Corruption Annual Report 2024



Snippets from NPAs e-learning course on anti-corruption 2024



Norwegian People's Aid

Norwegian People's Aid (NPA) had more than 1.8 billion NOK in revenues in 2024 for its programmes in 37 countries around the world.

Corruption is a challenge in international aid and humanitarian operations, as it undermines the very purpose of our mission of supporting people and societies in crisis situations, as well as in the long run towards peace and development. NPA is concerned with such risks and takes a strong stand against corruption throughout our organisation and programmes.

NPA is moving steadily forward both in terms of funding and programme growth. This means that we also need to strengthen the protection of our resources and make sure that the funds are well spent. Our policy reflects zero tolerance for corruption – which means that we make every effort to promote transparency and integrity in our programmes. It also means that we emphasise prevention through training and dialogue. Furthermore, we check all reports and complaints, large and small, with a view to rectifying and learning from our mistakes and return mismanaged funds to the programme or the donor.

We believe that transparency in reporting contributes to raising awareness on corruption risks, as well as lessons learned on handling cases.

1) Major achievements

NPA's [Anti-Corruption policy](#) was adopted in November 2022, followed by a case handling procedure and e-learning course. The latter was published on the International Anti-Corruption Day on 9 December 2024 and is included in the basic training package for all NPA staff.

After two years with the current policy and procedure, NPA is continuously in the process of rollout and awareness-raising throughout the organisation and stakeholders.

During 2024, NPA provided Anti-Corruption (AC) classroom training of staff in our largest programmes, including full day workshops in *Iraq, South Sudan, Ukraine, Bosnia, Laos and Vietnam*. In addition, AC training was on the agenda for finance, logistics and HR managers staff at our regional meetings for Africa in Nairobi, Asia in Bangkok, and Europe and Middle East in Istanbul.

The Anti-Corruption Group (ACG) comprises the Chief Financial Officer (CFO), Chief Accounting Officer (CAO), Human Resources Head of Section Operation Services and Special Advisor for Anti-Corruption. The AC Focal Points for Department for Mine Action and Disarmament (DMAD) and Development and Humanitarian Cooperation (DHC) participate in the weekly meetings for updates on cases. The ACG updates policies and procedures, keeps track of progress with case management, reports to the board, and is a final decisionmaker on cases. ACG is coordinated and lead by the Special Advisor for Anti-Corruption.

The main points in NPA’s Anti-Corruption Policy:

- NPA defines corruption as: **the abuse of entrusted power for private benefit**. This includes both financial and non-financial benefits.
- NPA practice **zero tolerance** for corruption. That means it reacts promptly on suspicion and confirmed corruption.
- NPA is committed **to transparency and integrity** throughout its operations, and **accountability** towards its stakeholders.
- The policy is applicable to **all NPA staff**, and both staff and stakeholders have an **obligation to report** suspicion of corruption, large and small.
- The roles and responsibilities for managers and staff at Head Office and Country Offices are described in detail in the policy. A common denominator for all managers, staff and volunteers is to **act with integrity** in line with this policy, starting with the tone from the top.

2) New corruption complaint cases 2024

14 new cases were reported to NPA’s Anti-Corruption Group (ACG) in 2024

CaseNumber	Name of case
AC 2024-14	Kickback in procurement
AC 2024-13	Food diversion
AC 2024-12	Fuel theft
AC 2024-11	Double invoicing
AC 2024-10	Fuel theft
AC 2024-09	Money laundering by partner
AC 2024-08	Procurement of several unrelated items
AC 2024-07	Manipulation of procurement
AC 2024-06	Travel claim
AC 2024-05	Rent for housing
AC 2024-04	Food diversion
AC 2024-03	Food diversion
AC 2024-02	Misuse of NPA property
AC 2024-01	Small theft RD residence

South Sudan (4) Mozambique (2) South Africa (2) Laos (2) Cambodia (1) Iraq (1) Rwanda (1) Ukraine (1)

3) Closed whistleblower cases in 2024

It should be noted that the cases below are finalized and closed in NPA's system. However, final confirmation from donor is pending in some cases.

ACG closed 19 cases in 2024

CaseNumber	Name of case
AC 2024-12	Fuel theft
AC 2024-11	Double invoice
AC 2024-10	Fuel theft
AC 2024-09	Money laundering by partner
AC 2024-06	Travel claim
AC 2024-02	Misuse of NPA property
AC 2024-01	Small theft RD residence
AC 2023-25	Blank invoices
AC 2023-24	Purchase of chair
AC 2023-23	Procurement of uniforms
AC 2023-22	Money theft and disappearance of leader
AC 2023-13	Corruption and harassment by partner
AC 2023-12	Procurement of tools
AC 2023-11	Kickback from supplier
AC 2023-07	Anniversary costs
AC 2021-17	Conflict of interest by partner
AC 2021-14	Theft from cash box
AC 2020-22	Irregularities in programme
AC 2020-20	Financial irregularities by partner

Iraq (5) Rwanda (2) Laos (2) South Sudan (2) South Africa (2) Mozambique (1) Ukraine (1) Syria (1) Cambodia (1) Vietnam (1) Yemen (1)

The following cases are examples of what happened, how they were handled and what we learnt. It is not an exhaustive list, but demonstrate the variety of cases

AC 2024-11 Double invoice

What happened?

Suspicion of double invoices following the report of two different batches of invoices presented to Finance.

What did we do?

The investigation found that the scope of the allegation was limited to small purchases, and the result of misconduct and maladministration, not corruption. Since the invoices were not paid, no donor funds

were misused. The accused staff member was given a written warning and had to reimburse unaccounted money.

What did we learn?

Provide regular refresher anti-corruption training for all employees, and stress segregation of duties especially those handling procurements and purchasing, to increase awareness of common fraud schemes and best practices for preventing them.

AC 2024-10 Fuel theft

What happened?

An employee was suspected of stealing fuel, as it was noticed a discrepancy between kilometres driven and fuel gauge on several occasions.

What did we do?

The allegation was investigated and confirmed, the staff member confessed and was dismissed.

What did we learn?

The fleet team needs to upgrade the fuel tank by installing anti-theft measures on the organization's vehicles to prevent similar cases from happening in the future.

AC 2023-07 Anniversary costs

What happened?

Allegations of excessive spending on the marking of NPA's anniversary led to inquiry.

What did we do?

The costs were not in line with to NPA's internal guidelines, as well as the contract agreement with the donor. Based on that, the costs of the anniversary were returned to the donor.

What did we learn?

We must ensure that we have sufficient awareness and compliance with our donor-agreements as well as our own guidelines and strengthen our checks and balances to prevent similar situations in the future.

AC 2023-12 - Procurement of uniforms

What happened?

A whistleblower reported suspected fraud in procurement of uniforms and tools.

What did we do?

An investigation was carried out, and the allegations were confirmed. As per NPA's Code of Conduct, the actions constituted misconduct categorized under 'fraud'. Fake signature and documents for suppliers were used to give advantages to a preferred supplier which turned out to be a "ghost" company.

What did we learn?

Reduction of the value for the need to obtaining three quotations, and review of all active suppliers in our system, including physical checks of location, ownership and tax registration etc. Increased awareness of finance staff on the documentation required to support procurement processes. Creation of a simple procurement checklist for all the different types of transactions, with documentation requirements and authorisation limits.

AC 2021-14 – Theft from cash box

What happened?

During an exit interview, a staff member alleged involvement in financial malpractice together with colleagues, including sharing NPA funds between them meant for activity implementation and falsification of documentation to cover up their actions.

What did we do?

An investigation was carried out and confirmed the allegations. The main perpetrators were dismissed, and a written warning given to the one accused, and the missed funds were recovered from their social insurance.

What did we learn?

The risk of similar malpractice is there. However, it is hoped that the investigation and the sanctions in this case will send a clear message of deterrence to the rest of the team. Based on the findings in the investigation, internal control mechanisms need to be strengthened.

AC 2023 and 2024 Several cases related to food diversion

What happened?

Reports on food diversion from the warehouses and distribution points for beneficiaries were reported on several instances.

What did we do?

Investigations revealed that serious and deliberate acts of negligence were committed with the intention of committing fraud. The diversion happened with the knowledge of or involvement of other stakeholders.

What did we learn?

The internal control measures and recommendations from previous investigations were not sufficiently implemented. Lack of NPA staff presence enables corruption and malpractice. New Country Director takes measures to close these cases, and implement recommendations.

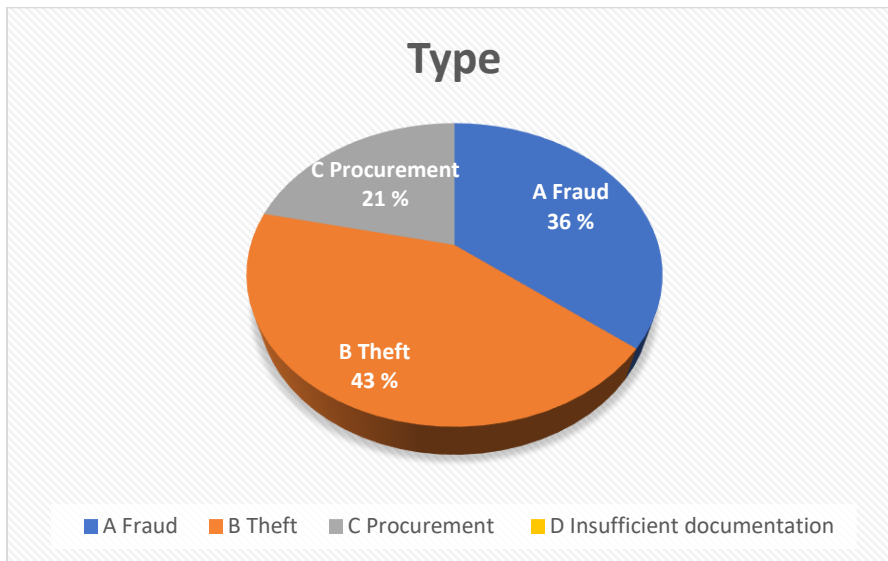
4) Ongoing cases

There were 19 ongoing cases at the end of 2024

CaseNumber	Name
AC 2024-14	Kickback procurement
AC 2024-13	Food diversion
AC 2024-08	Procurement of several unrelated items
AC 2024-07	Manipulation of procurement
AC 2024-05	Rent for housing
AC 2024-04	Food diversion
AC 2024-03	Food diversion
AC 2023-21	Theft from compound
AC 2023-19	Insurance fraud
AC 2023-18	Fraudulent partner
AC 2023-15	Irregularities related to salaries
AC 2023-10	Irregular purchase of services
AC 2023-09	Financial irregularities by partner
AC 2023-08	Nepotism in recruitment process
AC 2023-04	Embezzlement of food
AC 2023-03	Vending of stolen food
AC 2023-02	Stolen food oil from field office
AC 2022-12	Theft of laptops etc
AC 2022-06	Misappropriation of funds

South Sudan (11) South Africa (2) Mozambique (2) Iraq (2) Rwanda (1) Sudan (1)

5) 2024 Types of corruption (based on the 14 new cases)



6) Way forward

- Strengthen reporting mechanisms, including the anonymous whistleblower channel with the view to lower the threshold for reporting
- Finetune the case-handling system and raise awareness on roles and responsibilities
- Continue classroom AC training for staff and stakeholders
- Advocate and monitor the implementation of the AC e-learning course (from 2024)
- Make an extra effort to finalise and close all old cases.
- Introduce anti-corruption focal points at country level

Thanks to all NPA staff and stakeholders for enforcing the AC policy and procedure!

February 2025

NPA Anti-Corruption Group