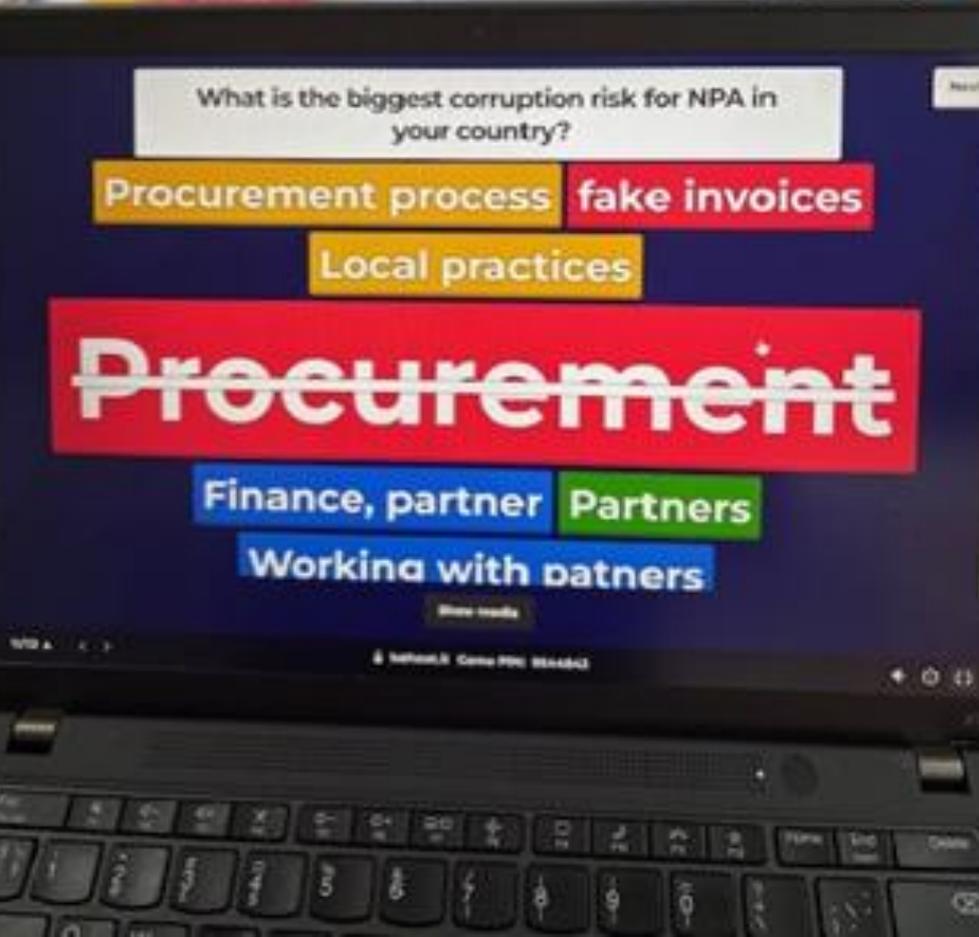


Anti-Corruption

Annual Report 2025



Norwegian
People's Aid

Anti-Corruption Annual Report 2025

Norwegian People's Aid

PB 88 44 Youngstorget
N-0028 Oslo, Norway

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Introduction

With democratic values and the rule of law under pressure around the world, NPA welcome the recently launched [guideline on Anti-Corruption](#) by the Norwegian Government. The guideline reflects the government's efforts and positions in the global fight against corruption and reiterates anti-corruption as a cross-cutting topic in international aid and as a precondition for fulfilling the development goals. Corruption in humanitarian aid is particularly damaging as it deprives the most vulnerable people, including in crisis situations, of essential life-saving support. Corruption kills!

Corruption is a challenge for NPA. With reference to the Corruption Perception Index from Transparency International, most of our programme countries are ranked at the lower end, and the average score for NPA in 2025 is 27 (of 100 possible)

NPA has therefore zero tolerance for corruption so that we can carry out our mission without diversion of resources. Our [AC policies and procedures](#) further reflects a commitment to transparency and integrity throughout our operations and accountability towards our stakeholders. We have also committed ourselves to report suspicions of corruption, and to make sure that all complaints are followed up professionally and efficiently.

The current funding crisis in the humanitarian sector has further increased the need for integrity in our work, and enforcement of NPA's own anti-corruption rules and regulations. Besides, donors have become more demanding, and as pointed out in the assessment from Norad prior to becoming a Strategic Partner ("Plusspartner"), we need to strengthen our efforts in this area. Deviation and waste of funds may undermine the very trust and reputation of NPA's "solidarity in action".

The Lebanon embezzlement case referred to below is particularly severe. It is most unfortunate both in terms of financial loss and reputation. It should not have happened, and it demonstrates the importance of having good risk management systems.

NPA publishes annually this report on our anti-corruption work, reflecting cases as well as preventive action to handle corruption risks and responses. By sharing experiences, we hope that the report will contribute to learning and better preparedness. Also, we hope that transparency on what happened, what we did and what we learned contribute to building trust and to support our programmes.

1) Achievements on NPA's anti-corruption work

In 2025 NPA established a global network of NPA's Anti-Corruption Focal Points at country level. The focal points support the Country Director in all matters related to corruption/anti-corruption, most notably to follow up on complaints, facilitate investigation and promoting preventive measures. Some of the focal points have initiated anti-corruption workshops and awareness raising with partners locally. Three global AC network meetings were organized in 2025, and we will continue with quarterly network meetings in 2026 with the view to share experiences and learn from each other.

On the occasion of the Anti-Corruption Day, we reminded staff worldwide to do the mandatory one hour e-learning AC session as a supplement to classroom training. E-learning is effective and easily accessible but cannot entirely replace group discussions and classroom training with colleagues.

One full day classroom training was provided by Head Office (HO) for the country teams of Mozambique, South Africa and Zimbabwe, on a regional meeting in Maputo in May. We hope to be able to continue to provide support from HO to such workshops also in other countries for our staff and stakeholders in 2026.

With the reorganization of HO in 2025, the case management system on anti-corruption has been subject to some adjustments. The AC function has moved from the Finance Department to the Governance and Compliance Unit. The Anti-Corruption Group now comprises the Head of the International Department, Chief Financial Officer, Section Manager for Institutional Donors, Discipline Lead on Compliance, Section Manager HR, and Special Advisor on Anti-Corruption. The ACG updates policies and procedures, keeps track of progress with case management, reports to the board, and is final decisionmaker on cases. ACG is led by the Special Advisor on Anti-Corruption.

2) New corruption complaint cases 2025

14 new cases (L1) were registered for further action by the NPA's Anti-Corruption Group (ACG) in 2025.

Case number	Name
AC 2025-15	Fraud related to finance and procurement
AC 2025-14	Nepotism in recruitment
AC 2025-13	Fraud and manipulation of logistics documents
AC 2025-12	Abuse of logo and identity
AC 2025-10	Embezzlement through bank transfers
AC 2025-09	Suspicion of corrupt leader
AC 2025-08	Unauthorized Supplier Awarded Tender
AC 2025-07	Procurement of food baskets
AC 2025-06	Double dipping
AC 2025-05	Suspicion of collusion with partner
AC 2025-04	Conflict of interest NPA and partner
AC 2025-03	Fraud in travel claim
AC 2025-02	Food theft
AC 2025-01	Theft of uniforms, detector and more

Syria (2) Rwanda (2) Sudan (2) Ukraine (1) Tajikistan (1) Angola (1) Mozambique (1) Laos (1) Zimbabwe (1) Yemen (1) Lebanon (1)

One case stands out from the list in terms of severity and volume; NPA identified a large embezzlement at our Lebanon country office. The embezzlement was identified by HO employees in October 2025. An internal investigation was promptly initiated, and the incident was reported to the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim). Over a two-year period, NOK 35 million of company equity was misappropriated. Two employees based in the Beirut office have been terminated.

In short, the embezzlement occurred through forged documents and the misuse of positions and powers that gave access to funds through local banks. For more information, [Read web article here.](#)

3) Closed complaint cases 2025

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 15 cases (L1) in 2025

Case number	Name
AC 2025-09	Suspicion of corrupt leader
AC 2025-08	Unauthorized Supplier Awarded Tender
AC 2025-05	Suspicion of collusion with partner
AC 2025-04	Conflict of interest between NPA and partner
AC 2025-03	Fraud in travel claim
AC 2025-02	Food theft
AC 2024-14	Kickback in procurement
AC 2024-05	Rent for housing
AC 2023-21	Theft from compound
AC 2023-19	Insurance fraud
AC 2023-18	Fraud by partner
AC 2023-15	Irregularities related to salaries
AC 2023-09	Financial irregularities by partner
AC 2023-08	Nepotism
AC 2023-02	Theft of food oil

South Sudan (6), South Africa (2), Iraq (2), Zimbabwe (1), Laos (1), Rwanda (1), Angola (1), Mozambique (1)

Examples

AC 2025-05 – Suspicion of collusion with partner

What happened?

Staff acted without informing anyone or seeking approval on behalf of partner to go ahead with arrangements for an event. The staff issued go ahead to partners in writing to proceed without internal formal approvals, and donor approval for modification, resulting in loss of funds for partners. There was suspicion of collusion and fraud due to very high number of proposed invitees and the overall high cost for the event.

What did we do?

The event was cancelled and partners who were tasked to cover services reported incurred costs. As advised by the NPA lawyer, the staff member was asked to cover the losses incurred by partners as an amicable solution before possibly taking legal action.

What did we learn?

Always refer to the approved and signed contract and always report any deviations to NPA before taking any decisions. Any additional activity or reallocation must be approved prior to implementation of decisions as per NPA's Delegation Directive, finance and other manuals and established practice of checks and controls.

AC 2025-04 – Conflict of interest between NPA and partner

What happened?

Allegation of conflict of interest and that NPA seems to have an agenda in undermining the establishment of a broader coalition of organizations and networks fighting against the war, and of supporting only the organizations that align themselves with its programmatic interests.

What did we do?

Investigation of the allegations did not reveal any evidence of formal conflict of interest, but perceptions of favoritism and lack of transparency exist. The situation reflects broader competition and polarization within the civil society in the country.

What did we learn?

NPA is seen as a unifying and inclusive actor, but improvements in communication, documentation, and outreach could help mitigate future misunderstandings. Even perceived conflicts of interest can undermine trust and credibility. Clear documentation of partner selection criteria and decisions (including non-selection) helps mitigate allegations of favoritism. Establish formal, accessible, and independent complaint channels.

2025-03 Attempted fraud with hotel invoices

What happened?

A quality control was conducted. Upon conclusion of the mission, the officers submitted claims for reimbursement of per diem and accommodation was received.

However, upon scrutiny of the submitted accommodation invoices, inconsistencies were discovered on the invoices which required further explanation by the officers, and investigation confirmed if it was a case of fraud.

What did we do?

Since there was no need for further investigation following the confirmatory information from the partner, the matter was raised to senior management for their attention and further action on the officers.

The programme also decided to immediately suspend the two officers from receiving any support through the project. This communication was made to partner management, and both parties agreed to this decision. Additionally, NPA has asked partner to ensure that the officers return the amount they received for accommodation.

What did we learn?

Regular control and scrutiny of claims may contribute to detecting and preventing such fraudulent activities.

AC 2023-22 - Theft of money and disappearance of leader

What happened?

After the leader of a partner organization had not been seen for a week, and the monthly salary was due to pay, it was revealed that there was not enough money to accomplish the task.

What did we do?

The case was reported to the police, and a special audit was carried out. The audit concluded that the unsupported transactions indicate misappropriation of funds including other findings such as falsification/manipulation of bank statements, and lack of staff contracts. These findings are characteristics of potential malpractice that may result in fraud in the implementation of programme activities. The missing funds were paid back to NPA.

What did we learn?

It was recommended that the management of the partner organization should strengthen its internal controls to ensure compliance with donor agreement and that donor funds are properly maintained, utilized, monitored, and adequately accounted for.

AC 2023-18 Allegation of misconduct of funds in partner's partner organization

What happened?

The NPA whistleblower channel received an alert relating to an organization indirectly associated to NPA through a partner organization. The alert was anonymously sent by a person who claims to have been swindled by the organization in the sense that their entitlement from the organization was not paid, plus questioning the entire relevance of the project.

What did we do?

In response to these allegations of corruption and financial mismanagement, a forensic investigation was initiated by NPA's partner organization. The investigation found no evidence validating the allegations of financial misconduct. However, it revealed shortcomings in the organization's internal control systems, particularly in financial policies, segregation of duties, and conflict of interest policies, indicating a need for policy enforcement.

What did we learn?

Although the investigation did not validate allegations of financial misconduct, it provided a roadmap for the organization to strengthen its internal control systems and ensure transparency and ethical conduct in its operations. The investigator has expressed its readiness to provide support in implementing these recommendations if needed.

2023-15 Irregularities in remuneration

What happened?

As part of the review of partner's financial report, a spot check was scheduled with the partner. However, the spot check could not be carried out because the necessary documents were not available. The partner stated that their documents were not complete because staff salaries were not paid, yet the summary of the financial report submitted to NPA indicated that the salaries had indeed been paid. When asked further on why the staff salaries were not paid, the partner mentioned that they have no access to their bank account since there is only one signatory present. The partner was advised to complete the documents, so that spot checks could be undertaken, but this was not adhered to.

What did we do?

These findings were investigated further, and it was concluded that serious acts of forgery/or financial manipulation and mismanagement may had taken place with the knowledge and or involvement of the partner's management. The investigation committee noted that despite being given the opportunity to defend themselves, the management did little to respond accurately to the findings of the investigation committee. As a result, the committee recommended suspending all funds to the partner, and claim refund of all disallowed funds, and terminate the partnership agreement.

What did we learn?

Based on the investigation findings above, a lesson is to increase the number of visits (financial and programmatic) and mandatory spot checks to all partners, as well as strengthening thorough and timely review of financial vouchers.

2023-11 Irregularities with partner

What happened?

A series of allegations on financial irregularities in a partner organization were reported. The irregularities included mockup of attendance list to activities in the project, manipulation of costs for training materials and stationary, conference halls that had not been used, but reported as such, lunches and drinks that were not provided to the participants in activities, were paid for.

What did we do?

Further installment of funds were frozen, and a special review was carried out and confirmed the allegations. The misallocated funds were paid back to donor.

What did we learn?

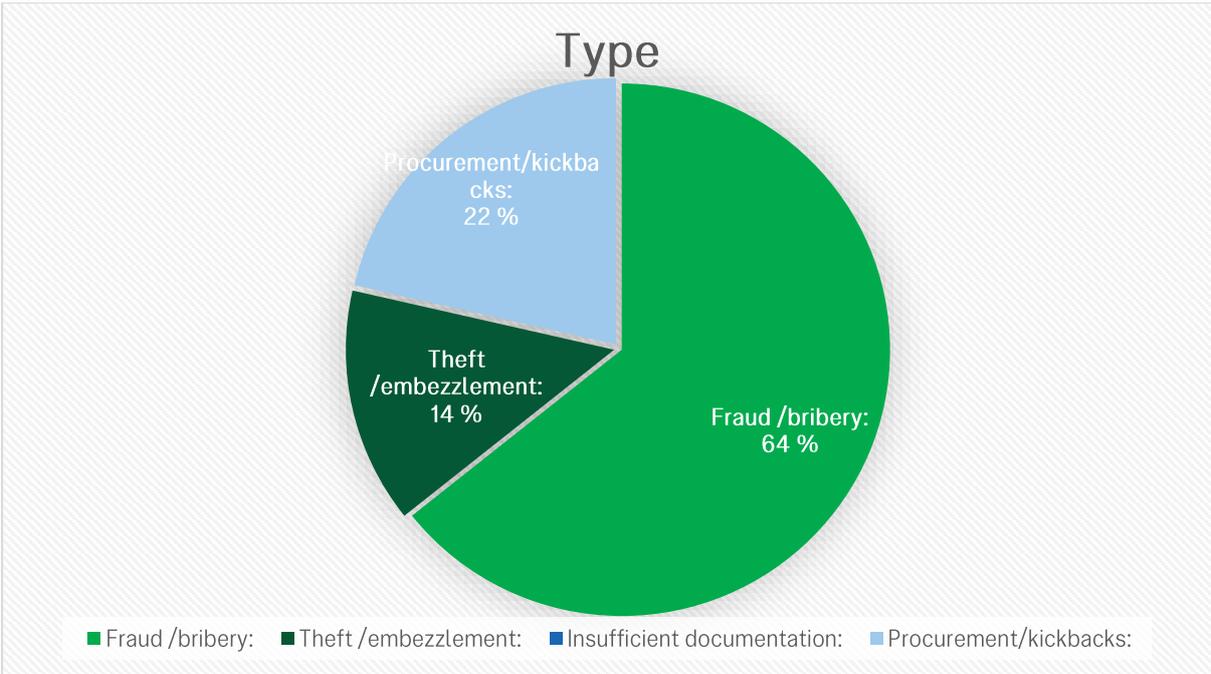
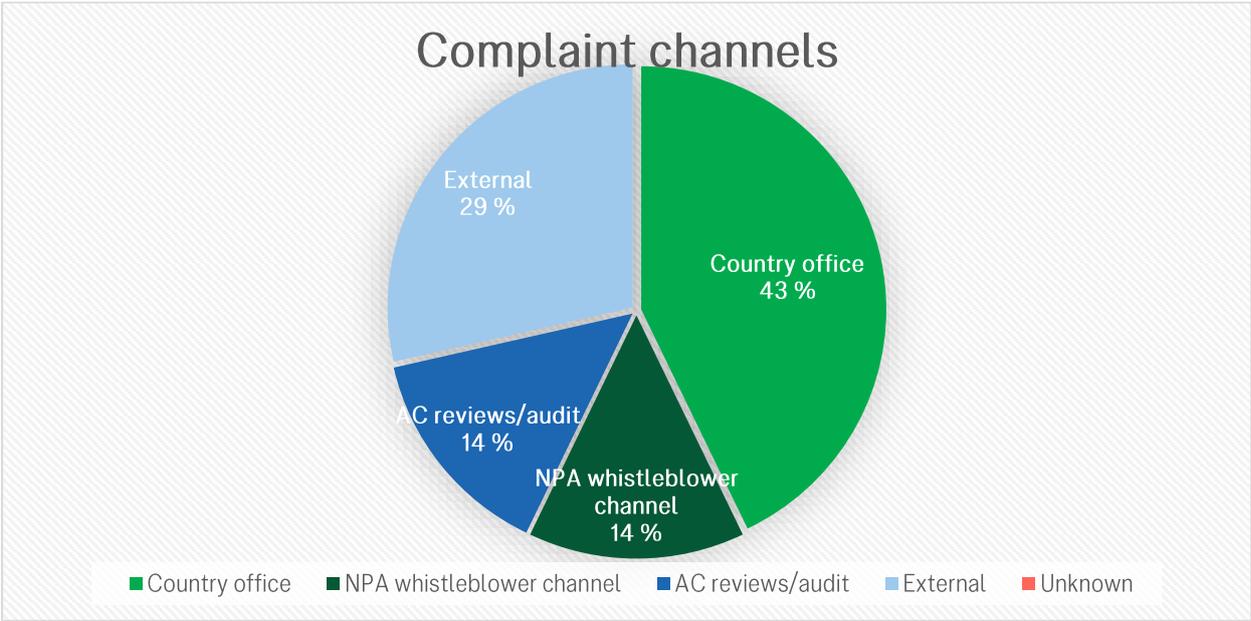
With a view to preventing fraud in such projects, specific documentation of all activities is key, including report for each training session, use of materials, evaluation feedback and attendance list. The management should investigate and recover funds transferred to participants who did not attend the training.

4) Ongoing cases

There were 16 ongoing cases (L1) at the end of 2025

Case number	Name
AC 2025-15	Fraud related to finance and procurement
AC 2025-14	Nepotism in recruitment
AC 2025-13	Fraud and manipulation of logistics documents
AC 2025-12	Abuse of logo and identity
AC 2025-10	Embezzlement through bank transfers
AC 2025-07	Procurement of food baskets
AC 2025-06	Double dipping
AC 2025-01	Theft of uniforms, detector and more
AC 2024-13	Food diversion
AC 2024-08	Procurement of several unrelated items
AC 2024-07	Manipulation of procurement
AC 2024-04	Food diversion
AC 2024-03	Food diversion
AC 2023-10	Irregular purchase of services
AC 2023-04	Embezzlement of food
AC 2023-03	Vending of stolen food

South Sudan (6), Rwanda (2), Sudan (2), Mozambique (2), Ukraine (1), Tajikistan (1), Lebanon (1) South Africa (1)



5) Way forward

As we look ahead, the need for anti-corruption measures will only intensify. Our challenge is clear: to do more with less funds, while maintaining the highest standards of integrity. This calls for continued awareness raising, learning and determination.

NPA has zero tolerance for corruption and states the obligation to all staff and stakeholders to report suspicion of corruption. Yet, there were only 15 complaints that were registered for further action in 2025. We recognize that it takes courage to blow the

whistle. Fear of harassment and retaliation in the workplace, as well as a sense of loyalty to colleagues in spite of observed wrongdoing, little response and uncertainty around complaints, and fear of getting involved in a case with the workload it takes, might lead to silence.

Thus, we will need to continue to protect the whistleblowers rights and continue to build trust so that we get the reports that are essential for rooting out financial crime and corruption in our activities. NPA put in extra efforts this year to strengthen our global whistleblower system, so that we obtain quicker responses and more professional follow-up.

The embezzlement case in Lebanon will be a priority for 2026, both in terms of finalizing investigation of all important aspects of the case, and to strengthen our systems in finance at HO and country offices, as well as any other lessons from the case with a view to preventing such cases in the future. In this context it will be important to ensure transparency on what went wrong so that we can learn from it, and at the same time respect confidentiality to protect sensitive information. We hope to be able to strike the right balance in this work, to build trust and to move forward.

Thanks to NPA staff and stakeholder for enforcing the AC policy and procedures

February 2026

NPA Anti-Corruption Group

PB 8844 Youngstorget
N-0028 Oslo, Norway



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