Anti-Fraud and Anti-Corruption Policy of Bhutan Media Foundation

Thimphu, Bhutan
Adopted in June 18, 2025

TABLE OF CONTENTS

Introduction

The Anti-Fraud and Anti-Corruption Policy of the Bhutan Media Foundation (BMF) is established in accordance with national legal frameworks, including the Anti-Corruption (Amendment) Act of Bhutan 2022 and supporting rules, regulations, and guidelines issued by the Anti-Corruption Commission of Bhutan. This policy also ensures compliance with the Civil Society Organizations Act of 2007 (Amendment 2022), the CSO Rules and Regulations (2017), and the Bhutan Civil Society Accountability Standards (2023).

It is mandated for adoption by the BMF Management and shall be subject to periodic review.

Purpose

The Anti-Fraud and Anti-Corruption Policy of BMF is established to:

2.1 Cultivate integrity by embedding transparency, accountability, and ethical conduct into all BMF operations and programmes;

2.2 Manage risk by providing a robust framework for the prevention, detection, and response to fraud, corruption, bribery, and embezzlement;

2.3 Ensure compliance with all applicable national laws and standards, including the Anti-Corruption Act and the Civil Society Organizations Act;

2.4 Uphold a zero-tolerance culture by aligning BMF's internal controls with the strategic objectives of the Anti-Corruption Commission and the CSO Authority.

Scope

This policy applies to:

3.1 Every individual working for or with BMF, including all staff (full-time, part-time, contract, temporary), interns, volunteers;

3.2 Members all BMF committees;

3.3 All third-party representatives acting on BMF's behalf, including contractors, consultants, and service providers;

3.4 Every BMF activity, program, and asset, regardless of its physical location or the source of its funding.

Definitions

For the purpose of this Policy, the following terms shall have the meanings ascribed to them:

4.1 Fraud – The deliberate act of deceiving, hiding, or misrepresenting information to gain an unfair advantage or harm another person's rights.

4.2 Corruption – The abuse of entrusted authority or power for personal benefit, which includes acts such as bribery, misuse of position, or manipulation of influence.

4.3 Bribery – The act of offering, giving, receiving, or requesting something of value to improperly influence a person's judgment, decision, or action.

4.4 Conflict of Interest – A circumstance in which an individual's personal, financial, or other interests could compromise, or appear to compromise, their ability to make impartial and objective decisions.

4.5 Whistleblower – An individual who, in good faith, reports suspected misconduct, such as fraud or corruption, under this Policy.

4.6 Integrity – Demonstrating honesty, fairness, transparency, accountability, and commitment to the public good, in line with Bhutan's values of public service ethics.

Principles

5.1 Integrity and ethical conduct – Everyone is expected to uphold honesty, fairness, and behavior consistent with BMF's core values.

5.2 Transparency and accountability – All activities, decisions, and financial transactions must be properly recorded, open to scrutiny, and capable of being audited.

5.3 Prevention first – Emphasis is placed on building strong systems and controls to minimize the risk of wrongdoing.

5.4 Zero tolerance – BMF strictly prohibits any form of fraud or corruption, and such actions will result in disciplinary and/or legal consequences.

5.5 Whistleblower protection – Individuals who report concerns in good faith will be safeguarded from retaliation, and their confidentiality will be maintained.

5.6 Continuous improvement – BMF is committed to regularly reviewing and enhancing its systems, procedures, training, and monitoring to ensure ongoing integrity and effectiveness.

5.7 Inclusion, Diversity and Equality – BMF pledges that our policies will seek to promote equality, fairness, and respect for all staff and stakeholders.

Key Commitments of BMF

The BMF pledges to:

6.1 Conducting periodic risk assessments of fraud and corruption across all its programs and operations.

6.2 Maintain strong internal control systems, including segregation of duties, proper authorization processes, and clear audit trails.

6.3 Uphold fairness, transparency, and merit in all recruitment, promotion, and training decisions.

6.4 Provide ongoing training and awareness programs on ethics, anti-fraud and anti-corruption measures, conflict of interest management, and reporting procedures.

6.5 Establish and sustain confidential and secure channels, including anonymous options, for reporting suspected cases of fraud or corruption.

6.6 Fully cooperate with investigations conducted by the Anti-Corruption Commission and the CSO Authority of Bhutan or any other authorized bodies when required.

6.7 Enforce appropriate sanctions for misconduct, including disciplinary measures, contract termination, recovery of losses, or referral for legal action.

6.8 Periodically review this policy and related procedures to ensure they remain consistent with national laws, best practices, and organizational developments.

Roles and Responsibilities

7.1 Executive Director – Demonstrate leadership by example, integrate the policy into daily operations, assign clear responsibilities, monitor compliance, and foster a culture of integrity throughout the organization.

7.2 Project Officers – Identify and manage risks within their projects, ensure that all team members understand and adhere to this policy, and promptly escalate any concerns or irregularities.

7.3 All Staff, Contractors, and Consultants – Familiarize themselves with the policy, disclose any potential conflicts of interest, report suspected misconduct in good faith, and cooperate fully with investigations. All staff are governed by the BMF Rules and Regulations 2020 and the BMF Code of Conduct for Staff.

7.4 Compliance/Integrity Officer – Oversee the implementation of this policy, receive and manage reports of suspected wrongdoing, coordinate investigations, and liaise with auditors and the Anti-Corruption Commission when necessary.

Reporting and Investigation Mechanism

8.1 Anyone who becomes aware of or suspects fraud or corruption is required to report it immediately through BMF's established reporting channels.

8.2 Reports can be submitted anonymously; however, providing one's identity may help facilitate a more effective investigation.

8.3 All reports will be handled with strict confidentiality and fairness. BMF upholds a zero-tolerance policy against any form of retaliation toward whistleblowers.

8.4 Reported cases will first be investigated internally. If sufficient evidence indicates a serious offence, the matter will be referred to the Anti-Corruption Commission (ACC) or other relevant authorities.

8.5 All investigations will be conducted objectively, promptly, and in compliance with legal and procedural safeguards.

Conflict of Interest and Gifts/Hospitality

9.1 Employees must steer clear of any circumstances where their personal interests could interfere with, or appear to interfere with, BMF's objectives or impartial decision-making.

9.2 Any actual or potential conflict of interest must be promptly disclosed to the Compliance/Integrity Officer, who will ensure it is properly managed through measures such as recusal or additional oversight.

9.3 Gifts, hospitality, or other forms of benefit may only be accepted if they are modest, appropriate, transparent, and cannot reasonably be perceived as influencing professional judgment.

9.4 The acceptance or offering of bribes, favors, or any form of improper inducement is strictly forbidden.

Procurement and Financial Management

10.1 All procurement activities must be carried out transparently and competitively, with proper documentation, and in full compliance with BMF's Procurement Policy and relevant national regulations.

10.2 Financial operations should be properly authorised, supported by clear audit trails, regularly reconciled, and subject to both internal and external audit reviews.

10.3 High-risk undertakings, such as large-scale contracts or externally funded projects, must include additional safeguards, such as independent verification, dual approvals, or third-party oversight.

10.4 Any form of fund misuse, falsified claims, embezzlement, collusion, or receipt of kickbacks constitutes serious misconduct and may result in disciplinary action or referral for criminal investigation.

Orientation and Communication

11.1 BMF will ensure that all new employees, contractors, and relevant partners receive an induction session on this Policy as part of their onboarding process.

11.2 Regular refresher sessions will be organized to raise awareness on issues such as fraud, corruption, conflicts of interest, whistleblowing, and ethical standards.

11.3 The Policy will be shared broadly with BMF's Board, staff, and stakeholders to promote understanding and accessibility.

11.4 BMF's leadership will continuously demonstrate and emphasize its commitment to integrity, transparency, open dialogue, and accountability.

Monitoring, Review and Assessment

12.1 The Compliance/Integrity Officer will regularly track key metrics, such as reported cases, investigations, outcomes, audit results, and control weaknesses, and present periodic updates to senior management and the Board.

12.2 BMF may also engage external reviewers or independent assessors from time to time to evaluate the effectiveness of its internal controls, training programs, and integrity culture.

12.3 This Policy will be reviewed at least once every two years, or sooner if necessary, in response to changes in national laws, regulatory requirements, donor obligations, or emerging risks.

Sanctions and Consequences

13.1 Failure to comply with this Policy, including engaging in fraud, corruption, or related misconduct, will result in disciplinary measures, which may extend to termination of employment or contracts.

13.2 BMF will pursue recovery of any financial losses, may suspend or blacklist individuals or organizations from future engagements, and, when warranted, refer cases for civil or criminal action.

13.3 The severity of the sanctions will correspond to the seriousness of the violation and align with applicable legal and regulatory requirements.

BHUTAN MEDIA FOUNDATION

www.bmf.bt
P.O box: 1655, Thimphu, Bhutan
Telephone: +975-02-331705