

Anti-corruption Policy

MSF Sweden / Läkare Utan Gränser

Owner:	Controller
Applies to:	All employees, interns, volunteers, consultants and other individuals acting on behalf of MSF Sweden
Audience:	Public
Version:	v. 3.0
Approved by:	General Director
Document date:	2026-08-18
Review schedule:	Every 3 years (next due 2029-08-18)
Related documents:	Whistleblower Guideline

1. Background and purpose

Médecins Sans Frontières (MSF) / Läkare Utan Gränser relies on the trust of patients, donors, members, employees, volunteers and the public to fulfil its humanitarian mission. Maintaining that trust requires that all activities are conducted with integrity, transparency, accountability and independence.

MSF Sweden is committed to preventing corruption and ensuring that organisational resources, authority and influence are used solely in support of the organisation's mission and objectives.

The purpose of this policy is to:

- define MSF Sweden's principles and expectations regarding corruption;
- prevent, detect and respond to corruption and related misconduct;
- support objective and impartial decision-making;
- safeguard organisational resources and reputation; and
- promote a culture in which concerns can be raised and addressed appropriately.

2. Definitions

2.1. Corruption

Corruption is the abuse of entrusted power, position, influence or organisational resources for improper personal, organisational or third-party benefit.

Corruption may take many forms, including bribery, fraud, embezzlement, favouritism, abuse of position and unmanaged conflicts of interest.

2.2. Conflict of interest

A conflict of interest exists when personal interests, relationships or commitments could influence, or appear to influence, the objective performance of duties or decision-making on behalf of MSF Sweden.

Conflicts of interest may be actual, potential or perceived.

2.3. Fraud

Fraud is any intentional act of deception, misrepresentation or misuse of resources for the purpose of obtaining an improper benefit or causing a loss to another party.

3. Guiding principles

MSF Sweden is committed to conducting its activities with integrity, transparency, accountability and independence. All individuals covered by this policy are expected to contribute to a culture that prevents corruption and promotes ethical decision-making.

In preventing corruption and related misconduct, MSF Sweden is guided by the following principles:

Integrity: All decisions and actions shall be undertaken honestly, objectively and in the best interests of MSF Sweden and its humanitarian mission.

Accountability and stewardship: MSF Sweden's funds, assets, information, reputation and other resources shall be used responsibly, efficiently and solely for legitimate organisational purposes.

Transparency: Decisions and use of resources shall be appropriately documented and, where relevant, open to review and scrutiny.

Independence: MSF Sweden safeguards its independence from political, commercial and other external interests. Donations, partnerships and external relationships must not compromise, or appear to compromise, the organisation's mission, values, priorities or public positions.

Avoidance of conflicts of interest: Actual, potential and perceived conflicts of interest shall be disclosed and managed appropriately to protect the integrity of decision-making.

Speaking up: Individuals covered by this policy are expected to raise concerns regarding suspected corruption, fraud, conflicts of interest, misuse of resources or other conduct that may violate this policy.

Zero tolerance for corruption: MSF Sweden does not tolerate corruption in any form and will take appropriate and proportionate action to prevent, investigate and respond to violations of this policy.

Protection for reporting in good faith: Individuals who report concerns in good faith or participate in investigations shall not suffer retaliation.

4. How we prevent corruption

MSF Sweden seeks to prevent corruption through a combination of governance, internal controls, transparent decision-making and a culture of accountability.

Key measures include:

- onboarding and training of employees and other relevant individuals regarding anti-corruption, internal controls and related policies;
- procurement processes designed to ensure fair, transparent and responsible use of organisational resources;
- financial controls, segregation of duties, delegated authorities and appropriate approval mechanisms;
- requirements to disclose and appropriately manage actual, potential and perceived conflicts of interest;
- regular assessment and management of risks, including risks related to fraud and corruption;
- mechanisms for reporting concerns and suspected misconduct; and
- oversight by management, the Board, external auditors and relevant external control bodies.

All individuals covered by this policy contribute to preventing corruption through ethical conduct, responsible use of resources and by raising concerns when misconduct is suspected.

5. Prohibited Conduct

MSF Sweden does not tolerate corruption in any form. Individuals covered by this policy must not engage in, facilitate, conceal or knowingly permit conduct that violates this policy.

Prohibited conduct includes, but is not limited to, the following:

5.1. Bribery and Improper Benefits

No individual may offer, promise, give, request or accept any payment, gift, hospitality, favour or other benefit intended to improperly influence a decision, action or outcome.

Benefits that could influence, or appear to influence, professional judgement or organisational decision-making are prohibited.

5.2. Conflicts of Interest

Individuals must disclose actual, potential and perceived conflicts of interest and manage them appropriately.

Individuals must not participate in decisions, recommendations or processes where a conflict of interest could compromise, or appear to compromise, their objectivity, independence or impartiality.

This includes, but is not limited to:

- procurement decisions;
- recruitment and employment decisions;
- engagement of consultants;
- allocation of organisational resources; and
- decisions relating to fundraising, partnerships governance, advocacy or public policy engagement.

5.3. Abuse of Position

Individuals must not use their position, authority, access, influence or information obtained through their role for personal gain or to improperly benefit another person, organisation or interest.

This includes favouritism, nepotism and other forms of preferential treatment that are not based on objective and legitimate considerations.

5.4. Fraud and Misuse of Organisational Resources

MSF Sweden's funds, assets, information, systems, working time and reputation shall only be used for legitimate organisational purposes.

Fraud, theft, embezzlement, falsification of records, misrepresentation, intentional misuse of resources and other dishonest conduct are prohibited.

5.5. Undue Influence and Protection of Independence

MSF Sweden safeguards its independence in fundraising, communications, advocacy and external engagement.

No individual may seek, accept or exercise improper influence over organisational decisions, priorities, public positions or activities for personal, political, commercial or other improper purposes.

Donations, partnerships, sponsorships and other external relationships must not be used to obtain inappropriate influence over the organisation's decisions or activities.

6. Roles and responsibilities

Preventing corruption is a shared responsibility. Effective prevention depends on ethical conduct, accountability and vigilance from all individuals covered by this policy. The following roles have particular responsibilities under this policy:

Board: Provide oversight of anti-corruption framework.

General Director: Ensure implementation of the policy.

Managers: Promote compliance with the policy, help prevent misconduct and respond to concerns.

Controller: Maintain the anti-corruption framework, advise on corruption risks, support investigations, monitor implementation, and promote awareness of anti-corruption requirements through training and internal communication.

All individuals covered by this policy: Comply with this policy, disclose actual, potential and perceived conflicts of interest, and promptly report concerns regarding suspected misconduct or violations of this policy.

7. Reporting concerns

Individuals covered by this policy who become aware of, suspect, or have reasonable grounds to believe that conduct contrary to this policy may have occurred are expected to raise their concerns as soon as possible.

Concerns may be raised through normal management channels, other designated reporting mechanisms available within MSF Sweden, or through the whistleblowing channel. Further information is available in the [Whistleblower Guideline](#).

Reports will be handled appropriately, confidentially and in accordance with applicable laws and internal policies.

No individual shall suffer retaliation for raising a concern or reporting a suspected violation in good faith, regardless of whether the concern is ultimately substantiated.

8. Investigation and response

Reports and allegations of suspected corruption or other violations of this policy will be assessed and, where appropriate, investigated in a fair, impartial and objective manner.

Investigations shall be conducted with due regard for confidentiality, the rights of the individuals involved and applicable legal requirements.

Where a violation is confirmed, MSF Sweden will take appropriate action to address the matter, prevent recurrence and strengthen relevant controls where necessary.

9. Consequences of policy violations

Failure to comply with this Policy may result in disciplinary or other appropriate action, depending on the nature and severity of the non-compliance and in accordance with applicable legislation, employment agreements, and organisational procedures.

Change Log

Version	Date	Summary of changes	Updated by
3.0	2026-08-18	Comprehensive review and restructuring of the policy to improve clarity and focus on the organization's anti-corruption principles, responsibilities and measures.	Controller