

Integrity, Procurement and Conflicts of Interest

Controls to use resources for their stated purposes, select suppliers fairly and disclose interests that may influence decisions.

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Registration status: Registration in progress.

Adopted by authorised management on 15 October 2026 as internal commitments and procedures during registration. This adoption does not imply completed registration or statutory effectiveness of the internal bylaws.

1. Fraud and corruption prohibition

Bribery, theft, forgery, collusion, hidden commissions, inflated prices or beneficiary counts, money laundering and financing unlawful activities are prohibited. Do not invent data, invoices, quotations, certificates or project histories. Attribute founders' previous work to the individuals and capacities involved; do not present it as the organisation's institutional record without evidence.

2. Interests and gifts

Decision-makers disclose family, financial, employment or expected-benefit interests involving an applicant, supplier or partner before decisions. Record the interest and remove the person from evaluation and approval, assigning an authorised unconflicted decision-maker. Cash gifts and benefits that influence decisions are prohibited; modest hospitality or tokens require recording under written controls. Office does not confer preference in assistance or procurement.

3. Procurement and evidence

Start with a documented need, verifiable specification, budget and approval authority. Obtain independent comparable offers and assess quality, safety, suitability, warranty and total cost. For DAP, provide the required product quotations, including at least two where the programme requires them. Do not split purchases to avoid approval controls. Document the reason and authorisation for any exceptional direct purchase. Retain requests, bids, evaluation, contract, receipt, invoice, payment and asset records.

4. Financial separation and records

Keep organisational funds separate from personal and other entities' accounts. Under bylaw Article 42, expenditure and transfers require the Chair or Deputy Chair together with the Treasurer; no person may approve, execute and audit the same expenditure. Reconcile accounts, check assets and review access when roles change. Retain financial records for at least five years or longer where law or agreement requires, and obtain audit when applicable requirements trigger it. These are controls, not a claim that a bank account or completed audit already exists.

5. Counterparty and funding checks

Verify supplier and partner identity, funding sources, signing authority and receiving account. Check applicable sanctions, counter-terrorism restrictions and donor requirements before contracting and payment. Reject anonymous-source funding or conditions that compromise independence or breach law. An application or publication does not prove completed registration; disclose the status and obtain required documents before commitments that require them.

6. Reporting and response

Use the complaints channels, preserve evidence and exclude conflicted decision-makers. Notification must not wait for proof. Report suspected or actual fraud or corruption to DFAT within the contractual period; where its general toolkit period applies, within five working days, notifying the agreement manager and using fraud.corruption@dfat.gov.au. Assess fairly and take appropriate loss-prevention, recovery and referral action without retaliation.

Governance and document control

Policy owner: Board of Directors, under Article 53 of the approved internal bylaws. Review at least annually and after significant incidents or changed requirements. Arabic and English versions are published together; any ambiguity must be resolved without weakening protection. No past training, screening or donor certification is asserted by this document.

DFAT Fraud and Corruption Control: [Official reference](#)

DFAT Fraud and Corruption Toolkit: [Official reference](#)

Web version: greatiraq.com/policies/integrity/en/