

ANTI-CORRUPTION POLICY

CODE OF CONDUCT OF THE EVANGELICAL MISSION IN SOLIDARITY (EMS) AGAINST CORRUPTION AND FOR TRANSPARENCY

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1. BIBLICAL ASPECTS

The fight against corruption is a recurring theme in the Bible. The prohibition of theft, bribery, slander and other forms of abuse of entrusted power for private gain is enshrined in the Ten Commandments and in the subsequent regulations: “You shall not steal.” (Ex 20:15) “You shall not bear false witness against your neighbour.” (Ex 20:16) “You shall take no bribe, for a bribe blinds the officials, and subverts the cause of those who are in the right.” (Ex 23:8) “Cursed be anyone who takes a bribe to shed innocent blood.” (Dt 27:25). Consequently, the first Christian congregations took a very clear stance against all forms of corruption. They expected their leaders to have integrity and to be honest with money. (cf. Act 5, 1 Tim 3,8)

The Bible is remarkably transparent in its reporting on corruption. Cases of corruption are not hushed up, even in the case of high-ranking individuals. They are disclosed - sometimes down to the smallest detail. The misbehaviour of the perpetrators is described, and the corresponding punishments and sanctions are also reported. The condemnation of Ananias and Sapphira (Acts 5) is one example. The aim is to prevent misbehaviour and to enforce the order desired by God.

Decisive for the understanding of the fight against corruption in the Bible is that these regulations were instituted by God himself. Accordingly, the Bible clearly condemns and combats violations of these legal requirements. The Bible warns that God himself will punish the perpetrators and reward those who have behaved correctly: “...but those who hate bribes will live.” (Prov 15:27)

2. BASIC PRINCIPLES

The EMS is an international association of Protestant churches and mission societies in Africa, Asia, the Middle East and Europe, bound together by faith in Jesus Christ and hope in the kingdom of God. It brings partnership to life through mutual empowerment and solidarity, learning together, joint planning, decisions and actions, and through the sharing of resources, gifts and abilities (EMS Constitution §2(3)). No-one may benefit by any expenditure that is alien to its purposes or by disproportionately high compensation for services (EMS Constitution §3(5)).

Corruption is an existential threat to the orderly peaceful coexistence of people. The member churches and mission societies in the EMS Fellowship are aware that they bear a special responsibility for exemplary ethical and social behaviour. The EMS Fellowship stands together against all forms of corruption and the misuse of goods. Within the EMS, cases of corruption will be handled transparently and without regard to gender, position or social background.

3. CORRUPT BEHAVIOUR

3.1. Definition of corruption

In line with international anti-corruption organisations such as Transparency International, we define corruption as “the abuse of entrusted power for private gain”.

Corruption includes the following offence in particular:

3.2. Active bribery

A person shall be guilty of active bribery if they offer, promise or grant an undue advantage to members, employees or representatives of public authorities, companies, organisations or churches etc. for their own benefit or for the benefit of third parties in return for performing or omitting to perform an act that is in breach of these persons’ duty or is within their discretion.

3.3. Passive bribery

A person shall be guilty of passive bribery if they demand, secure the promise of, or accept undue advantage, either for their own benefit or for the benefit of third parties, in return for performing or omitting to perform an act that is in breach of their own duty or is within their own discretion.

3.4. Granting of advantages

A person shall be guilty of granting advantages if they offer, promise or grant an undue advantage to members, employees or representatives of public authorities, companies, organisations or churches etc. in consideration of these persons’ future conduct as holders of such positions.

3.5. Acceptance of advantages

A person shall be guilty of accepting advantages if they demand, secure the promise of, or accept an undue advantage from others in consideration of their own future conduct.

3.6. Undue advantages

“Undue advantages” are defined as all material or immaterial advantages which go beyond common social practice and which are of more than negligible value, e.g. the acceptance of personal gifts, invitations or reimbursement of expenses which exceed the appropriate limits in the context of the country concerned. In case of doubt, the person’s superior must be informed.

3.7. Coercion

A person shall be guilty of coercion if they compel another person to perform, refrain from performing or tolerate an act by means of force, by threatening serious disadvantages or by otherwise restricting that person’s freedom of action. Coercion also includes all forms of sexual harassment (cf. EMS Safeguarding Policy).

3.8. Further offences

Further offences are often committed in connection with corrupt conduct: violation of state laws and regulations, embezzlement, theft, fraud, blackmail, nepotism, merging private and professional interests, criminal mismanagement and falsification of documents.

4. SCOPE OF THE EMS ANTI-CORRUPTION POLICY

4.1 EMS staff and members of EMS bodies

The provisions of the EMS Anti-Corruption Policy shall be a binding part of the contractual relationship for all EMS employees as well as for members of EMS bodies.

4.2 EMS programmes and projects

Compliance with the provisions of the EMS Anti-Corruption Policy shall be a binding requirement for all projects and programmes carried out or supported by the EMS or by the EMS in cooperation with its members or its partners (cf. EMS Policy on Financial Support for Projects and Programmes in the EMS Fellowship). The provisions of the policy shall also apply to volunteers working in EMS programmes and projects.

4.3 EMS members

EMS member churches and member organisations shall commit themselves to actively support the fight against corruption within their respective regulatory responsibility and to issue corresponding regulations within their legal jurisdictions or alternatively to comply with the EMS Anti-Corruption Code.

5. IMPLEMENTATION

5.1 EMS Anti-Corruption Supervisory Board

The Mission Council shall set up an Anti-Corruption Supervisory Board. It shall supervise the observance of the EMS Anti-Corruption Policy and investigate suspected cases of corruption within the area of responsibility of the EMS. EMS member churches and mission societies shall grant the EMS and the Anti-Corruption Supervisory Board information on the implementation of the Anti-Corruption Policy and on suspected cases of corruption on request and at all times.

The Supervisory Board shall consist of the Chair of the EMS Mission Council, one Deputy Chair of the EMS Mission Council, the legal advisor and the finance advisor of the EMS. The General Secretary shall participate in the meetings of the Anti-Corruption Supervisory Board in an advisory capacity. The Anti-Corruption Supervisory Board may consult additional experts.

If members of the Supervisory Board are unable to attend, they shall be represented by their substitutes.

In the event that a conflict of interest exists with a member of the Supervisory Board or the EMS member organisation which delegated the member of the Supervisory Board to the General Meeting, this person shall

withdraw for the course of the investigation. The substitute members shall then take over.

The term of office of the Supervisory Board shall terminate with the election of a new Supervisory Board by the Mission Council after termination of office of the General Meeting.

The Supervisory Board shall meet at least once a year to review the implementation of the Policy and in the event of charges of corruption of which it becomes aware.

5.2 Anti-corruption envoys of EMS members

To combat corruption, each member of the EMS Fellowship shall nominate an envoy from its own ranks to supervise the observance of the EMS Anti-Corruption Policy and to reply to inquiries. The respective members shall endow the envoy with all the necessary powers to investigate suspected cases of corruption. The envoy shall not suffer any disadvantages thereby. He/she shall be obliged to give information to the EMS Anti-Corruption Supervisory Board.

5.3 Procedures

5.3.1 Complaints

Everyone who has reason to believe that a breach of the regulations applicable to the Anti-Corruption Policy has occurred (cf. Article 3) shall be obliged to report the suspicion immediately to the Anti-Corruption Supervisory Board or the anti-corruption envoys.

When an anti-corruption envoy is informed of corruption charges, he/she shall immediately (within ten days at the latest) take up the matter and inform the Supervisory Board in writing. Confirmation that the complaint has been received will be sent to the person submitting it (the complainant) and he/she will also be informed about the result of the investigation.

5.3.2 Whistleblowing

All those involved in the EMS, especially the Anti-Corruption Supervisory Board and/or the anti-corruption envoys, shall take all the appropriate measures to protect complainants. Confidentiality is crucial to achieving satisfactory results because it protects the complainant, the subject of the complaint and any other witnesses. The fact that the complaint has been submitted, its nature, the identities of those involved and any documentation resulting from the investigation shall remain confidential and shall only be divulged for the purpose of conducting the necessary investigations.

In order to implement the German Whistleblower Protection Act (Hinweisgeberschutzgesetz), the Secretariat may also commission an external reporting centre.

5.3.3 Investigation

The Supervisory Board shall decide within one month on how to investigate a corruption charge. The Supervisory Board shall be free to commission third parties to investigate the corruption charges.

In cases of possible corruption or misappropriation of EMS resources, the EMS shall have the option of requesting additional documentation to substantiate the use of funds, e.g. payment receipts, lists of participants or contractual agreements with third parties. The EMS shall have the option of having external audits carried

out in accordance with international standards and of commissioning auditors and/or lawyers to carry out the corresponding investigation. The EMS shall have the right to choose the auditors and/or lawyers. In this case, the EMS will cover the costs.

If investigations are conducted by the Secretariat, the relevant legal requirements shall apply to all stakeholders. Unless otherwise determined, the place of jurisdiction shall be Stuttgart. The Secretariat shall be entitled to establish internal guidelines for the implementation of the policy.

The Supervisory Board shall submit reports during and after finalisation of the investigations to the EMS Mission Council as long as this does not jeopardise the investigation of a potential corruption case. In addition, the EMS Mission Council shall also be informed if the corruption charge cannot be clarified. Independently thereof, the Supervisory Board shall submit a report of activities to the EMS Mission Council, complying with data protection and confidentiality. If possible, the investigations shall be concluded within one year.

If there is a lack of cooperation in clarifying up a charge of corruption, the Supervisory Board may suspend payments at its discretion to the member church / member organisation in question.

The Supervisory Board shall report to the Mission Council concerning the results of the investigations. The Mission Council shall decide on the final measures to be taken.

5.3.4 Procedure in case of violations

If the above procedure confirms the suspicion that someone has violated the regulations pertaining in the EMS Anti-Corruption policy, the Mission Council shall impose sanctions and initiate legal steps as necessary. It shall take all the necessary measures for reimbursement of the misused goods.

The member church / organisation concerned may submit an appeal against the decision of the Mission Council. The member church / organisation shall have the right to be heard by the Mission Council in this matter. If the Mission Council adheres to its decision, the member may take legal action against the decision in order to have achieve binding clarification of the disputed facts. The place of jurisdiction shall be Stuttgart.

6. PREVENTION

The EMS will attach great importance to preventing corruption:

The EMS will encourage an organisational culture that commits itself to combat all forms of corruption. It will facilitate an open, multi-cultural exchange of practices on how to deal with corruption.

The “tone at the top” principal emphasises the importance of having strong anti-corruption values at the top of an organisation. The views and actions of leaders and executives are key to influencing the motivations and actions of employees.

Building intrinsic motivation to prevent corruption is based on the principle that the internal or psychological satisfaction of abstaining from corruption can be greater than the external rewards that result from engaging in it. The EMS will ensure that all programmes and projects are implemented as transparently as possible. All those

concerned and beneficiary groups of programmes and projects shall be informed of the grants in each case.

The EMS will conduct regular assessments of its corruption risks.

The EMS will ensure that all members, all project partners and all staff, board members and volunteers are familiar with the EMS Anti-Corruption Policy.

The EMS will take appropriate measures to prevent false accusations. It will bring forward such cases to the legal authorities, where necessary.

The EMS will provide appropriate training on corruption and measures to prevent and combat it. They shall include promoting personal standards, professional responsibility and providing guidance to stakeholders on how to implement anti-corruption standards when presented with ethical dilemmas. To strengthen joint commitment against corruption, the EMS may conduct awareness campaigns together with its members.

All Bible verses are quoted from the New Revised Standard Version Bible.

ANNEX

LIST OF ENVOYS AND MEMBERS OF THE ANTI-CORRUPTION SUPERVISORY BOARD

as of 8.1.2026

Members of the EMS Anti-Corruption Supervisory Board

Position	Name	E-Mail
Chairperson of the International Mission Council	Rev. Anne Heitmann (Protestant Church in Baden)	Anne.heitmann@ekiba.de
Deputy Chairperson of the International Mission Council	Rev. Junita (Toraja Church)	jjunitagiunita@gmail.com
Legal expert	Mr. Jo Hanns Lehmann	Jo-Hanns.Lehmann@ekhn.de
Business Management expert	Dr. Fabian Peters	Fabian.Peters@ELK-WUE.DE
General Secretary	Rev. Dr. Dieter Heidtmann	heidtmann@ems-online.org

Anti-Corruption Envoys of EMS Member Churches and Member Organisations

EMS Member Church/Organisation	Anti-Corruption Envoy	E-Mail
Moravian Church in South Africa (MCSA)	Mr. Manogaran Pillay	mpillay@moravian.co.za
Presbyterian Church of Ghana (PCG)	Mr. Alex De-Graft Hanson	lexidhans2004@gmail.com
The Episcopal Church in Jerusalem and the Middle East	Mr. Ghassan Isaac	ghassan.isaac@j-diocese.org
National Evangelical Church of Beirut, Lebanon (NECB)	NN	NN
Evangelical Christian Church in Halmahera, Indonesia (GMIH)	Mr. Amesius Bassay, M.Si.	amesius.bassay@gmail.com
Evangelical Christian Church in Minahasa, Indonesia (GMIM)	NN	NN
Christian Church of West Sulawesi, Indonesia (GKSB)	Rev. Simon Matius Topangae, M. Th.	stopangae71@gmail.com
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Christian Church in South Sulawesi, Indonesia (GKSS)	Mr. Frans Djohan, M.Si.	fransjohan0823@gmail.com
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Protestant Indonesian Church in Luwu, Indonesia (GPIL)	Mr. Natal Manan, SE., AK., CMA, CA	natalmanan@yahoo.com

EMS Member Church/Organisation	Anti-Corruption Envoy	E-Mail
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Protestant Church in Hesse and Nassau (EKHN)	Rechnungsprüfungsamt der Evangelischen Kirche in Hessen und Nassau	gs@rpa-ekhn.de
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