



# Anti-Bribery Policy of the Instituto Crecer Juntos

YEAR 2026

Version 2

GOVERNMENT OF EL SALVADOR

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## Board of Directors Resolution SO-01-ICJ-200122026-6

San Salvador, January 26, 2026. The Instituto Crecer Juntos

### Considering:

- I. That the Constitution of the Republic, in Article 34, recognizes the right of girls and boys to live in family and environmental conditions that allow for their integral development, for which they shall have the protection of the State. The Law shall establish and determine the duties of the State and shall create the institutions for the protection of motherhood and childhood.
- II. That the Ley Crecer Juntos para la Protección Integral de la Primera Infancia, Niñez y Adolescencia (Grow Together Law for the Comprehensive Protection of Early Childhood, Children, and Adolescents) establishes the Instituto Crecer Juntos as an official institution with legal personality under public law, its own assets, and technical, financial, and administrative autonomy; serving as a national reference in Early Childhood matters, with emphasis on the care of girls and boys from gestation until the age of four, and forming part of the National System for the Comprehensive Protection of Early Childhood, Children, and Adolescents.
- III. That through Legislative Decree No. 652, dated February 9, 2023, published in the Official Gazette No. 43, Volume No. 438, on March 2, 2023, the Public Procurement Law was enacted, which aims to establish the basic regulations governing the public procurement cycle that public administration must carry out to achieve its objectives, ensuring the efficient use of State resources. Article 16 of said Law establishes that the institutions determined by the Regulations of the Public Procurement Law must process, obtain, and maintain the Certification and Accreditation of the Anti-Bribery Standard, in accordance with existing international quality management standards.
- IV. That Article 10, subsection (a), of the Regulations of the Public Procurement Law establishes that autonomous institutions are among the entities required to manage, obtain, and maintain the respective Certification of the applicable Anti-Bribery Standard, in accordance with existing international Management System standards.
- V. That on August 20, 2025, Board of Directors Resolution No. SO-11 was issued, approving the first version of the Anti-Bribery Policy of the Instituto Crecer Juntos (SO-08-ICJ-200825). However, it is necessary to strengthen the measures, within the framework of continuous improvement, in order to adequately implement the Anti-Bribery Management System under ISO 37001. Therefore, the second version of the Anti-Bribery Policy of the Instituto Crecer Juntos is issued, with the purpose of ensuring compliance with legal and institutional obligations regarding the prevention, detection, and mitigation of bribery risks and anti-bribery management.

### Therefore:

In exercise of its legal powers,

### Resolves

To issue the following:





## ANTI-BRIBERY POLICY OF THE INSTITUTO CRECER JUNTOS

### CHAPTER I GENERAL PROVISIONS

#### 1.1. Objective

To establish the leadership and commitment of the Instituto Crecer Juntos (hereinafter referred to as ICJ) in promoting an institutional culture of zero tolerance toward bribery, as well as to ensure compliance with the implementation of the "Anti-Bribery Management System," with the purpose of preventing, detecting, mitigating, assessing, sanctioning, and not tolerating behaviors that compromise the fight against bribery at all levels of the institution.

#### 1.2. Scope and Field of Application of the Anti-Bribery Policy

##### 1.2.1. Scope:

This policy encompasses the integrating elements of the ICJ Anti-Bribery Policy. Bribery.

##### 1.2.2. Field of Application:

This Anti-Bribery Policy applies to all ICJ officials and personnel providing services under any form of employment relationship, such as: permanent staff, temporary staff, interns, social service participants, professional practitioners, volunteers, ad honorem collaborators, among others; as well as to suppliers, contractors, business partners, and any other interested party maintaining relations with the ICJ at the national level, including its departmental offices or delegates acting on behalf of and representing the institution.

#### 1.3. Legal Basis

1.3.1. Public Procurement Law, Article 16.

1.3.2. Regulations of the Public Procurement Law, Article 10, subsection (a).

1.3.3. Public Procurement Law, Article 16.

1.3.4. Regulations of the Public Procurement Law, Article 10, subsection (a).

1.3.5. Anti-Corruption Law, Article 3.

1.3.6. Administrative Procedure Law, Article 4, paragraph 4.

1.3.7. Grow Together Law for the Comprehensive Protection of Early Childhood, Children, and Adolescents, Article 178, attribution (1); Article 180, attribution (a); and Article 185.

1.3.8. Government Ethics Law, Article 8.

#### 1.4. Regulatory Framework

1.4.1. ISO 37001 Standard: Anti-Bribery Management Systems.

1.4.2. OECD Convention on Combating Bribery, 2010.

1.4.3. British Standards Institution (BSI) – BS 10500, United Kingdom, 2010.

1.4.4. ISO 19600 Supporting Standard: Compliance Management Systems – Guidelines.

1.4.5. ISO 37000 Supporting Standard: Governance of Organizations – Guidance.





- 1.4.6. ISO 37002 Supporting Standard: Whistleblowing Management Systems – Guidelines.
- 1.4.7. ISO 31000 Supporting Standard: Risk Management – Guidelines.
- 1.4.8. ISO 19011 Supporting Standard: Guidelines for Auditing Management Systems.
- 1.4.9. ISO 37301 Supporting Standard: Compliance Management Systems – Requirements with Guidance for Use.
- 1.4.10. Related Standard: ISO 9001: Quality Management Systems – Requirements.
- 1.4.11. Related Standard: ISO 9000: Quality Management Systems – Fundamentals and Vocabulary.
- 1.4.12. Related Standard: ISO 27001: Information Security, Cybersecurity, and Privacy Protection – Information Security Management Systems – Requirements.

## 1.5. Definitions

- **Senior Authority:** For the purposes of this policy, this refers to a public official holding a position within the Board of Directors, or the position of Executive Director or Manager at the Instituto Crecer Juntos. It is established that the role of the Governing Body corresponds to the Board of Directors, and that of Top Management corresponds to the Executive Director and Managers.
- **Conflict of Interest:** A situation in which an interested party has a personal or organizational interest, directly or indirectly, that may compromise or interfere with their ability to act impartially in performing their duties in the best interest of the institution.
- **Gift:** Anything given freely, which may be considered a bribe if used to dishonestly persuade someone to act in favor of another through a monetary gift or other incentives.
- **Integrating Elements:** Refers to the following components of the Anti-Bribery Policy: Mission, Vision, Anti-Bribery Management Principles, Anti-Bribery Policy Statement, Anti-Bribery Management Objectives, Reporting Channels, Whistleblower Protection, Consequences of Non-Compliance with the Anti-Bribery Policy, Verification, Communication, Review and Updating, as well as the Control of Formats and Annexes.
- **Risk Management Matrix:** A methodological tool used to identify, analyze, evaluate, and manage institutional risks, forming part of the Institutional Risk Management Plan.
- **Facilitation Payments:** Relatively small payments made to officials or institutional personnel to secure or expedite the required procedure or action.
- **Process:** A set of interrelated activities that transform inputs into outputs.
- **Risk:** An event or uncertain situation that may affect the achievement of the institution's objectives.
- **Bribery:** The offering, promising, giving, accepting, or soliciting of an undue advantage of any value, directly or indirectly, and regardless of location, in violation of the law, as an incentive or reward for a person to act or refrain from acting in relation to the performance of that person's duties.

## CHAPTER II ANTI-BRIBERY POLICY

### 2.1. Mission

We are the leading institution in the field of Early Childhood, working to ensure that every child reaches their full developmental potential through comprehensive and quality care.



## 2.2. Vision

To be the institution that guarantees the comprehensive care for children in their Early Childhood through intersectoral coordination, family strengthening, the provision of quality services, and the establishment of strategic alliances.

## 2.3. Anti-Bribery Management Principles

- 2.3.1. **Child-Centered:** All actions to prevent, detect, and address bribery are aimed at protecting the best interests of children, ensuring that no improper practice affects the quality, transparency, and equity of the services they receive.
- 2.3.2. **Leadership:** Senior Authorities at all levels exercise leadership by promoting a culture of integrity, transparency, and zero tolerance toward bribery.
- 2.3.3. **Commitment:** Staff members are competent, empowered, and committed to the institution's ethical values, actively participating in the prevention and reporting of any act of bribery, as well as in the enforcement of the anti-bribery policy.
- 2.3.4. **Process Management:** All institutional processes are designed, implemented, and monitored in a clear and controlled manner, minimizing bribery risks and ensuring traceability and accountability.
- 2.3.5. **Continuous Improvement:** The institution maintains an ongoing review of its anti-bribery management system, identifying opportunities for improvement and applying corrective and preventive measures to strengthen institutional integrity.
- 2.3.6. **Evidence-Based Decision-Making:** Any decision related to anti-bribery management is based on verified information and documented evidence, avoiding subjective judgments or undue influence.
- 2.3.7. **Stakeholder Relations:** The institution manages its relationships with stakeholders under principles of ethics and transparency, avoiding any undue advantage.
- 2.3.8. **Responsibility and Accountability:** Every member of the institution is responsible for complying with the legal, regulatory, and ethical obligations related to bribery prevention and must be accountable for their actions.
- 2.3.9. **Information Confidentiality:** Information obtained within the framework of anti-bribery management shall be handled with strict confidentiality.

## 2.4. Anti-Bribery Policy Statement

The Instituto Crecer Juntos, through its Board of Directors, Executive Directorate, Management Offices, and its departments or organizational units, as the national benchmark institution in Early Childhood matters, commits—within the framework of establishing an anti-bribery management culture—to:

- 2.4.1. Ensure ZERO TOLERANCE toward any form of corruption, bribery, fraud, conflict of interest, or any other unlawful or unethical behavior.





- 2.4.2. Maintain ethical conduct throughout all institutional operations, promoting an environment of integrity and transparency.
- 2.4.3. Ensure strict compliance with the principle of legality in all its operations and functions, consistently requiring the application of all applicable anti-corruption and anti-bribery laws and regulations, and using procedures to impose sanctions in accordance with the law.
- 2.4.4. Implement an Anti-Bribery Management System that complies with the requirements established by applicable laws and regulations, and that includes effective policies, procedures, and controls to detect, prevent, and mitigate risks associated with bribery in institutional processes—while also promoting continuous improvement to achieve the established anti-bribery objectives.
- 2.4.5. Establish reporting channels to ensure access for individuals to report any suspicion of bribery or other unlawful or unethical conduct.
- 2.4.6. Adopt all necessary measures to prevent irregular, illegal, unethical, or corrupt acts—especially those that constitute crimes against public administration in any of their forms—ensuring that bribery and integrity risks are properly controlled to prevent their occurrence.
- 2.4.7. The Instituto Crecer Juntos absolutely prohibits any act of offering, promising, requesting, delivering, or accepting facilitation payments, valuables, donations, gifts, rewards, promises, or other goods or services—whether financial or non-financial—for the purpose of obtaining, granting, or maintaining an undue advantage through bribery practices in the provision of services or execution of institutional tasks.

## 2.5. Anti-Bribery Management Objectives

- 2.5.1. Address 100% of reported cases of possible acts of corruption, bribery, or fraud, applying the corresponding sanctions in accordance with the law.
- 2.5.2. Provide training sessions for 100% of staff on topics related to ethics, integrity, anti-corruption, and anti-bribery.
- 2.5.3. Conduct compliance reviews to ensure the sustained implementation of the Anti-Bribery Management System.
- 2.5.4. Maintain an Anti-Bribery Management System certified under the ISO 37001 standard.
- 2.5.5. Ensure that 100% of received reports or complaints are registered and addressed securely and confidentially.
- 2.5.6. Carry out actions to manage bribery risks identified in the Institutional Risk Management Matrix.

## 2.6. Reporting Channels for Complaints or Notifications

- 2.6.1. The Instituto Crecer Juntos establishes an anti-bribery reporting channel, which may also be used anonymously, so that any person wishing to express concerns, notifications, reports, or complaints may do so personally or anonymously. The Instituto Crecer Juntos shall guarantee complete confidentiality and protection of the informant, ensuring that they do not suffer any type of retaliation, in order to safeguard their personal integrity and employment status.





2.6.2. Natural and legal persons, officials, as well as ICJ personnel, may report any suspicion or indication of bribery through the following channels:

**Email:** [denuncias.antisoborno@icj.gob.sv](mailto:denuncias.antisoborno@icj.gob.sv)

**Telephone:** 2239-8855

In person: At the Central Headquarters of the Instituto Crecer Juntos through the Compliance Officer.

## 2.7. Whistleblower Protection

2.7.1. It shall be ensured that all reports or notifications are made in good faith and will be treated with the highest level of confidentiality. Measures shall be taken to protect the identity of whistleblowers, ensuring that they do not suffer any kind of retaliation. All reports or notifications shall be investigated thoroughly and fairly, and corrective measures shall be taken to address any breach of ICJ policies.

## 2.8. Consequences of Non-Compliance with the Anti-Bribery Policy

2.8.1. In the event of non-compliance with the provisions of this policy by any official, public servant, or business partner, the corresponding legal measures shall be applied.

## 2.9. Compliance function

2.9.1. The Compliance Officer shall assume responsibility for the anti-bribery function. In the absence of the Compliance Officer, the Executive Directorate shall appoint an alternate member through the corresponding agreement, in order to ensure the sustainability of the anti-bribery function at the Instituto Crecer Juntos.

2.9.2. The Compliance Officer shall be responsible for verifying the level of compliance with the Anti-Bribery Policy of the Instituto Crecer Juntos and for identifying improvement actions to ensure its effective implementation.

2.9.3. To ensure the implementation of the Anti-Bribery Management System, the compliance function—whether exercised by the principal or the alternate—shall have independence within the organizational structure and decision-making authority in the performance of its duties, contributing to the achievement of the established objectives.

## 2.10. Communication

2.10.1. The Anti-Bribery Policy of the Instituto Crecer Juntos shall be communicated and disseminated to all staff members, interested parties, and business partners, ensuring proper understanding for institutional application.

2.10.2. The Instituto Crecer Juntos shall make the Anti-Bribery Policy available to all staff members and business partners.



## 2.11. Review and Updating

2.11.1. This policy shall be reviewed and updated whenever necessary in order to implement a process of continuous improvement in the anti-bribery management of the Instituto Crecer Juntos.

## 2.12. Monitoring, Follow-up, and Evaluation

2.12.1. The monitoring, follow-up, and evaluation of the Anti-Bribery Policy shall be carried out within the framework of the monitoring, follow-up, and evaluation actions of the Anti-Bribery Management System, the procedure for which shall be established in the Guidelines for the establishment, implementation, maintenance, and improvement of the Anti-Bribery Management System of the Instituto Crecer Juntos.

## 2.13. Control of Formats and Annexes

The control of formats and annexes shall be carried out in a document complementary to this regulatory document, which shall be coded and managed in its original version by the UPDI.

## CHAPTER III EFFECTIVENESS

This regulatory document shall enter into force upon its approval as recorded in the corresponding minutes of the Board of Directors' resolution.

DISSEMINATE AND COMPLY. -





GOVERNMENT OF EL SALVADOR