ANTI – FRAUD POLICY

1. Policy Statement

This policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against FOREARMS OF CHANGE CENTER (FOCCEC).

FOCCEC aims to prevent all means of fraud or any forms of dishonesty by creating an environment that is committed to ethical behavior, values and integrity. This policy applies to all stakeholders of FOCCEC from directors, staff and volunteers, any party who commits fraud or who is aware of it and doesn't report it will be subject to disciplinary action.

1 . Statement of Intent

FOCCEC ensures that all policies and procedures of its financial and administrative acts are carried out and reported accurately and accountably that all decisions are taken free of personal interest, from all staff members and volunteers. They all have responsibly in putting all this into action and report if any breach occurs.

2 . Fraud Definition

Fraud means any act of dishonesty. Any act of acquiring money or goods dishonestly through false records or documents. Any intended change of financial statement or any financial records or administrative documents by any director, staff member or volunteer of FOCCEC. This is considered a criminal act that shall be reported.

3 . Responsibilities

• **Trustee and Non-Executive Directors:**

They should be familiar with all types of fraud that might occur in their area. Their main responsibility is to establish and maintain the system of control internally, which supports

FOCCEC in achieving its goals and objectives. This system is an on-going process that identifies the risks assess them and manages them effectively. Fraud is one type of risk that should be studied assessed and analyzed.

- **<u>Executive Director:</u>**

Managing risks is delegated to the Executive Director, where he/she over looks day to day operation of the financial manager. The Executive Director is responsible in establishing a response plan in preparation to the level of fraud risk identified, design an effective control environment to prevent fraud, and establish appropriate mechanism in reporting any issue of fraud or any significant attempt of fraud.

- **<u>Financial Manager</u>**

Maintaining all financial records and tracking to all incomes and expenses of FOCCEC, and for all money transactions records and donations should be reviewed and validated main responsibility to assure anti-fraud.

- **<u>Staff & Volunteers</u>**

Each staff member and volunteer is responsible in acting respectability with the use of handling of FOCCEC's resources and use of funds in which every way they are (case, receipts, payments, supplies… etc.). They all shall be alert to at all times of any unusual event or transaction that could happen and which indicates fraud. They shall report any act for fraud or any opportunity for fraud would occur immediately.

4 Reporting

- Each staff member is responsible for reporting any act of fraud or any issue of suspected fraud in that matter. This shall be reported directly to the line manager. Most importantly, staff members are not to contact the suspect, or discuss the matter with anyone other than their line manager. Anyone who reports an act of fraud will be properly protected and supported by FOCCEC.

- Once a report is in hand, a full investigation shall take place with the Executive Director as a lead to this committee or team.
- Executive Director shall conduct a detailed investigation report, yet not to be shared with the staff member or FOCCEC partners.

Actions

- Once person proven guilty the person has committed a major misconduct that shall be dealt with according to HR policies disciplinary action and Jordanian Labor Law. The information of the person who has been found guilty shall be shared with external organizations, donors and regulatory bodies for future decision-making purposes.
- FOCCEC will refer significant fraud to the local law enforcement agencies.

5   Review

- If an act of fraud has been recorded, this means there is an absence in control, whether the systems or supervision. Thus, it is required to revisit the system and policy in order to improve and adjust accordingly.