

## **FRIDA / THE YOUNG FEMINIST FUND**

### **ANTI-FRAUD, ANTI-CORRUPTION AND OBLIGATION TO REPORT POLICY**

#### **POLICY**

FRIDA strives to provide a workplace environment with sound levels of due diligence and good operational and financial practices. FRIDA also strives to provide an environment in which all employees feel safe and protected in reporting circumstances where FRIDA staff, volunteers, contractors or suppliers are in contravention of FRIDA policies and local laws and regulations. FRIDA will protect itself from and will not tolerate fraud and other similar malpractices, which may include but are not limited to: acts of falsifying invoices or authorizations, receipts or reimbursement requests or valuation of assets or liabilities, intentional fabrication of reports or program activity, unlawful acts that misrepresent FRIDA, acceptance of gifts of excessive value, or of bribes. All staff must be above fraud and corruption. Sanctions will apply to those who are not. Staff are obligated to report any incidents of fraud or corruption which they suspect or of which they are aware. Staff may also refer to the Whistleblowing Policy to submit a report, which can be found in the staff handbook under section 3.12.

#### **PROCEDURE**

##### Making a report:

Individuals making a report may provide the information anonymously if desired. The reports will be received and investigated in confidence. The reports may be made to any of: the Co-Directors or to the Chair of the Board of Directors. If the person the individual is reporting about is the person's supervisor, the staff person may proceed with the report to their supervisor's manager. Reports should be made in writing with reasonable details and where possible, should include supporting documentation.

##### Verification of the Incident:

The written report, plus any other relevant documentation, along with the receiving individual's recommendations will be discussed by the Director's Team or by the Executive Committee of the Board of Directors, if it involves the Co-Executive Director. Each situation may require different procedures and scope. For example, the situation may be resolved internally, externally or by law enforcement authorities. An investigating team appointed by the Co-Executive Director's or the Board will review the circumstance for its risk implications, work with legal and other external advisors, if necessary, before making recommendations for follow-up action. The recommendations could include further formal investigation, disciplinary procedures, termination and if necessary, contact with law enforcement.

#### **PROTECTION**

The individual making the report will be protected from harassment, demotion, suspension, termination or any other retaliation as a result of making a report. If retaliation does occur, the person

or persons responsible will be subject to disciplinary measures which may include termination. All reports will be kept confidential unless and until such time as may be required by a court of law.

This protection does not extend to individuals who knowingly make a false or malicious report. Knowingly making a false or malicious report may result in disciplinary measures up to termination, as outlined in the Employee Handbook, Section 3.21, Termination of Employment –For Cause.

**Routines for sharing and signing off on policy:**

All staff will sign off on the Anti-Fraud and Anti-Corruption Policy upon hiring. All members of the Board of Directors will sign off as soon as they are onboarded. For contractors and suppliers, their MoUs will include a clause on anti-fraud and anti-corruption.

