

# **Nonviolent Peaceforce Anti-Fraud Policy**

## **Purpose**

This policy is established to provide increased protection to the assets and financial interests of Nonviolent Peaceforce, to provide a coordinated approach to the identification, investigation and resolution of fraudulent activities, and to increase the overall awareness of the responsibility to report fraud and reasonably suspected fraudulent activity to the appropriate reporting line management.

## **Scope**

This policy applies to any situation of fraud or suspected fraud involving Nonviolent Peaceforce employees, interns, suppliers, vendors, sub/contractors, consultants, outside agencies, and/or any other parties with a business relationship with Nonviolent Peaceforce.

Any investigative activity conducted will be done without regard to the suspected wrongdoer's title/position, past performance, or length of service to the organization.

## **Fraud Definition and Examples**

For purposes of this policy, fraud includes any willful or deliberate act committed with the intention of obtaining an unauthorized benefit, such as money or property, by misrepresentation, deception, or other unethical means.

Fraud and financial impropriety may include, but are not limited to the following actions:

- Embezzlement or other financial irregularities;
- Forgery, alteration, or falsification of documents (including checks, time sheets, travel expense reports, contractor agreements, purchase orders, other financial documents, student administrative or financial records, electronic files, etc.);
- Misappropriation, misuse, theft, removal, or destruction of Nonviolent Peaceforce resources (including funds, securities, supplies, inventory, furniture, fixtures, equipment, intellectual property or any other asset);
- Improprieties in the handling or reporting of money or financial transactions;
- Misuse of Nonviolent Peaceforce facilities (including telephones, computers and e-mail system);
- False claims by employees, vendors, or other associated with Nonviolent Peaceforce;
- Receiving or offering bribes, rebates, or kickbacks;
- Personal use of Nonviolent Peaceforce property in commercial business activities;
- Accepting or seeking anything of material value from contractors, vendors or persons providing or seeking to provide services/materials to the organization;
- Conflict of interest;
- Misrepresentation of facts;
- Any similar or related irregularity

## **Responsibilities**

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Nonviolent Peaceforce administrators at all levels of management are accountable for setting the appropriate tone of intolerance for fraudulent acts by displaying the proper attitude toward complying with laws, rules, regulations, and policies.

Managing administrators are responsible for identifying and assessing the level of the risks and exposures to fraudulent activity inherent in his or her area of responsibility. Additionally, managing administrators shall establish and maintain proper internal controls which will provide for the security and accountability of the resources within his or her department.

All Nonviolent Peaceforce employees are responsible for safeguarding the organization resources and ensuring that they are used only for authorized purposes, in accordance with Nonviolent Peaceforce rules, policies, and applicable international and national laws.

## **Reporting Fraud**

Employees and other individuals associated with the organization community, who become aware of, or have a reasonable basis for believing that fraud, defalcation, misappropriation or other fiscal irregularities has occurred shall promptly report the suspected activity to the Country Director, Finance Director or the Executive Director. They should not attempt to investigate the matter themselves.

Great care must be taken in dealing with suspected fraudulent activities so as to avoid any incorrect accusations, alerting suspected individuals that an investigation is under way, violating a person's right to due process, or making statements that could lead to claims of false accusations or other civil rights violations.

## **Investigation**

The Country Director or Internal Controller (HO Europe) is responsible for conducting investigations of fraud and suspected fraudulent activity reported to its line management. They should keep the global Finance Director informed at all stages. The Executive Director is responsible for conducting investigations involving the global HQ.

Internal audit may identify and investigate any suspected dishonest or fraudulent activity, which may represent risk of significant loss of assets or reputation to the organization, therefore Nonviolent Peaceforce may work with internal or external resources as circumstances may require.

In the event that internal audit determines that an investigation of suspected fraudulent activity is warranted, the Country Director will conduct the following procedural steps:

- Notify the Executive Director and Director of Finance (Europe).
- Advise management to meet with Human Resources Director to determine if any immediate disciplinary personnel actions should be taken or in their absence the Executive Director.
- Coordinate the notification of insurers and filing of claims.
- If donor funds are involved, determine the required donor reporting in cooperation with the donor relation department and Head of Mission / Country Director.
- If illegal activity is indicated, notify the proper authorities to coordinate an investigation.
- If illegal activity appears to have occurred, the findings will be reported to the appropriate agency for review.

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## Investigation Reporting

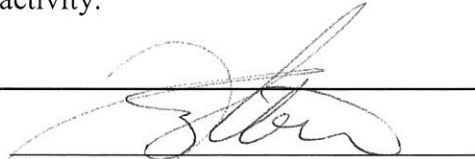
The Executive Management team will review and communicate the results of any investigation with responsible management administrators. It will make recommendations for improvement to the systems of internal control, as needed. The results of investigation will also be communicated to the President and Board of Trustees.

## Nonviolent Peaceforce Actions

Nonviolent Peaceforce will take appropriate disciplinary and legal action against any individual or entity who commits fraud against the organization. Any employee or supplier who engages in fraudulent activity relative to Nonviolent Peaceforce will be subject to discipline, which may include, but is not limited to, discharge from employment, expulsion from the organization and or criminal prosecution under appropriate laws.

## Whistle Blower Protection

In accordance with the Whistle Blower Protection Act any Nonviolent Peaceforce employee who reasonably believes that fraudulent activity has been conducted by another employee and reasonably reports the activity will not be subjected to an adverse employment action as a result of reporting the activity.

<b>APPROVAL</b>	<div data-bbox="402 840 873 1039"> Executive Director</div> <div data-bbox="980 898 1242 1039">Date <u>8/10/18</u></div>
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