



## Anti-Fraud and Theft Policy

### 1.1.1. Policy Statement

ALIGHT SOUTH SUDAN has a zero-tolerance policy with respect to fraud committed or attempted by all individuals and organizations covered by this policy.

Covered individuals and organizations include:

Staff, Interns, volunteers, any ALIGHT SOUTH SUDAN representatives, Sub-awardees, vendors, suppliers, consultants, and others with whom ALIGHT SOUTH SUDAN provide assets in exchange for services or products.

### 1.1.2. Definitions

This policy defines “Fraud” and “Theft” as following dishonest behaviours:

- **Fraud:** any dishonest act by an individual or group categorized by a deliberate intention to conceal or falsely represent, resulting in an actual or potential loss to ALIGHT SOUTH SUDAN or a third party, whether or not for personal gain. Examples of fraud include: false invoicing, bribery, payroll or procurement fraud, diversion of assets, forgery and money laundering.
- **Theft:** dishonestly taking or appropriating any item of property that belongs to another.

### 1.1.3. Procedures for Assuring Compliance

#### 1.1.3.1. Prevention and Awareness

All individuals covered by this policy must:

- a) Read and comply with this Policy. Failure to comply with this Policy may result in disciplinary or legal actions being taken.
- b) Behave honestly while carrying out ALIGHT SOUTH SUDAN’s work.
- c) Avoid situations where their behaviour could be misinterpreted as dishonest.
- d) Ensure that all appropriate ALIGHT SOUTH SUDAN policies and procedures are followed to minimize the chance of dishonest behaviour occurring.
- e) Declare any possible conflict of interest that might leave a window of a suspicion of fraud or corruption.

See below for Rules and Procedures applying to Partners organizations.

ALIGHT SOUTH SUDAN’s Partners (i.e. Sub-awardees, partners, vendors, suppliers, consultants, and others with whom ALIGHT SOUTH SUDAN provide assets in exchange for services or products) must:



- a) Not commit fraud or behave in a dishonest or corrupt manner while carrying out work on behalf of or in connection with ALIGHT SOUTH SUDAN.
- b) Act in accordance with this Policy.
- c) Immediately report any suspicion of fraud, corruption, or dishonesty in whatever form related to its work with ALIGHT SOUTH SUDAN
- d) Preserve all records required for an investigation.
- e) Ensure that their employees and sub-contractors comply with this Policy.

#### 1.1.3.2. Reporting

All individuals covered under this policy must immediately report any suspicion of fraud in whatever form, even if it does not directly affect ALIGHT SOUTH SUDAN, to their direct supervisor. In case if they feel that they can't raise it with their direct supervisor they should contact the next line manager or HR and Country representative directly. Moreover, they can report the matter confidentially at [ComplaintsSouthSudan@Wearealight.org](mailto:ComplaintsSouthSudan@Wearealight.org)

Failure to report a reasonable suspicion of fraud in accordance with this Policy may result in disciplinary actions being taken.

#### 1.1.3.3. Investigation

All individuals covered by this policy must:

- a) Cooperate with any investigation by ALIGHT South Sudan.
- b) Preserve all records related to any alleged fraud.

Once a concern is received an Inquiry Committee may be constituted who is technically qualified and are sensitive enough to deal with the issue.

- The Inquiry Committee will consist of three (3) persons having high credibility, sensitivity and technical competency to handle such an issue, proposed by HR and nominated by CR. Preference should be given to include at least one woman having relevant expertise in the Committee.
- HR will inform the Committee Members of their nomination for conducting investigation.
- Head of HR shall get the Inquiry Committee together, summon meetings, initiate inquiries, and ensure that the inquiry process is documented through nominated members.
- Any dissenting note among the Inquiry Committee members should be noted along with the reasons for dissent.

**Inquiry Committee will ensure that:**

- Each complaint/concern is addressed responsibly and impartially facilitating just and fair inquiry process without retaliation (for complainants or the witnesses).
- They maintain an attitude of empathy at all times towards both the accused and the accuser.
- They maintain confidentiality of all grievance cases and proceedings and will give written recommendations to the Country Representative after the completion of such cases.



- Moreover, managers and senior staff must ensure that any employee who reported a concern in a good faith doesn't suffer because of this.

#### 1.1.4. Responsibilities of ALIGHT SOUTH SUDAN's Management

ALIGHT SOUTH SUDAN's Management must:

- a) Take corrective actions, including disciplinary, legal, or other appropriate actions, in light of any findings of fraud, with respect to relevant individuals (who committed fraud and/or anyone who knew of such fraud but failed to act or report).
- b) Take immediate steps following any incidents of fraud to review controls and protocols to identify and address any gaps or weaknesses.
- c) Conduct orientation to new staff members on this policy for new recruits. Operations department and Finance department will be responsible to do this during their orientation.
- d) Staff will be sensitised on the policy on a regular basis through the employment.
- e) Vendors will be sensitised on this policy and will be required to sign fraud notification statement when entering into contracts during pre-qualification process.

#### 1.1.5. Prevention, Detection and Deterrence of Fraud

- The company has established internal controls, policies, and procedures to deter, prevent, and detect fraud and corruption.
- New employees and contractors will be subject to background investigations, including a criminal background check. If a criminal background check facility is not available, a police clearance must be obtained. The Company will also verify all applicants' employment history, education, and personal references prior to making an offer of employment.
- Vendors, contractors, and suppliers must be active, in good standing, and authorized to transact business in their country. Vendors, contractors, and suppliers are subject to screening, including verification of the individual's or company's status as a suspended or debarred party.
- Contractual agreements with ALIGHT SOUTH SUDAN will contain a provision prohibiting fraudulent or corruptive acts and will include information about reporting fraud and corruption.
- ALIGHT SOUTH SUDAN employees receive fraud and corruption awareness training. New hires receive the training as part of their orientation at the commencement of employment and will sign a statement acknowledging that they have received and read the Sample Fraud Policy. All employees will receive fraud and corruption awareness training on a regular basis.
- A well-defined delegation of authority matrix must be signed by each authority designated to review and approve transactions.
- Periodical reviews, monitoring and compliance checks are undertaken to ensure no fraud incidences exist.



#### 1.1.6. Fraud Policy Acknowledgement

My signature acknowledges that I have read the Fraud Policy and that I understand my responsibilities related to the prevention, detection and reporting of suspected fraudulent activities.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date Signed: \_\_\_\_\_

Note: Please retain in employee's personnel file.