



AIMPO-ANTI-FRAUD AND WHISTLE- BLOWING POLICY

Fraud is defined as the intentional, false representation, or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Each member of the management committee will be familiar with the types of improprieties that might occur within his or her area of responsibility , and be alert for any indication of irregularity.

Corruption is the act of doing something with intent to give an advantage inappropriate with official duties to obtain a benefit, to harm or to influence improperly the actions of another party.

Action taken to instigate , aid , abet , attempt, conspire or cooperate in a fraudulent or corrupt act, also constitute fraud or corruption.

The anti- fraud and whistle-blowing policy is established to facilitate the development of control that will aid in the detection prevention of fraud against AIMPO. It is the intent of AIMPO to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of control and conduct of investigation.

8.1. Scope and application of Policy

This policy applies to any irregularity , or suspected irregularity involving employee as well as shareholder ,consultants , vendors , contractors, outside agencies doing business with employee of such agencies, and/ or any other parties with a business relationship with AIMPO.

Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position / title, or relationship to the AIMPO.

AIMPO has zero tolerance for fraud and corruption, meaning that AIMPO staff members, non-staff personnel, vendors, implementing partners and responsible parties are not to engage in fraud or corruption.

All incident of fraud and corruption are to be reported, and will be assessed and, as appropriate, investigated, when applicable. AIMPO will pursue rigorously disciplinary and other actions against perpetrators of fraud, including recovery of financial loss suffered by AIMPO.

AIMPO is committed to preventing identifying and addressing all acts of fraud and corruption against AIMPO, through raising awareness of fraud risks, implementing controls aimed at preventing and detecting fraud and corruption and enforcing this Policy.

This Policy applies to all activities and operation of AIMPO as well as those implemented by AIMPO. This policy aims to prevent, detect and address acts of fraud and corruption involving:

- (i) Staff members;
- (ii) Non-staff personnel, including Service Contract holders, Individual Contractors, volunteers and interns;
- (iii) Vendors, including actual or potential contractors and suppliers of goods and services(collectively, “vendors”); and

(iv) Implementing partners and responsible parties engaged/ contracted by AIMPO

8.2. Responsibilities of Employees

It is the responsibility of all employee to carry out their work in such a way as to prevent fraud occurring in the workplace . Employees must also be alert for occurrences of fraud , be aware that unusual transaction or behaviours could be indications of fraud and report potential cases of fraud.

It is responsibility of manager to be familiar with the type of fraud that might occur in their area to be alert for any indication of fraud or improper activity and to maintain controls to avoid such occurrences.

Managers should also ensure that staff be encouraged to report suspected issues of fraud.

8.3. Fraud prevention measures

8.3.1. Doing awareness on Fraud

Staff members non-staff personnel, vendors, implementing partners and responsible parties must be aware of their responsibility to prevent fraud and corruption . In this regard, managers have to raise awareness of this Policy, and reiterate the duty of all staff members to report instances of fraud and corruption.

Managers are also required to make non-staff personnel, vendors, implementing partners and responsible parties contacted/ engaged by their respective offices aware of this Policy.

8.3.2. Building fraud prevention into Programme and project design

When developing a new Programme or project, it is important to ensure that fraud risks are fully considered in the programme / project design and processes. This is especially important for high risk Programme / project , such as those that are complex or operate in high risk environments. These programme / project risk logs shall be communicated to relevant stakeholders, including donors , implementing

partners and responsible parties , together with an assessment of the extent to which risk s can be mitigated.

Programme and Project Managers are responsible for ensuring that the risk of fraud and corruption is identified during the programme/ project design phase. They are to consider how easily fraudulent acts might occur and be replicated in the day-to day operations. They are also to evaluate their impact, and the effectiveness of the measure taken to mitigate risks, including systemic actions. Informed decisions can then be made on additional mitigating actions.

8.3.3. Internal control system

A strong internal control system , where policies and procedures are enforced, internal controls are appropriately implemented and staff members, non-staff personnel, vendors, implementing partners and responsible parties are informed about fraud and corruption and its consequences, can curtail fraud and corruption.

8.4. Reporting fraud

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusation or alerting suspected individuals that an investigation is under way.

An employee who discover or suspects or suspects fraudulent activity will contact the Management Committee immediately. The employee or other complainant may remain anonymous . All inquiries concerning the activity under investigation will be given out .

In order for investigation to be successful, complaints should be as specific as possible . To the extent possible, they should include details such as:

- The type of alleged wrongdoing
- When, where and how the wrongdoing occurred; and
- Who was involved and may have knowledge of the matters being reported.

Relevant documents or other evidence should be include with the report or provided as soon as possible.

8.5. Action based on investigation

The allegation, if substantiated by the investigation, may result in disciplinary and/or administrative action or other actions taken by AIMPO, depending on the case.

The outcomes may be as follows:

- a) For staff members, disciplinary and / or administrative actions;
- b) For Service Contract holder and Individual Contractors, non-renewal or termination of their contract or other action as deemed necessary.
- c) For vendors, termination of the contract and exclusion from doing business with AIMPO or other sanctions;
- d) Referral to the public institutions for criminal investigation and prosecution;
- e) Recovery of financial loss and / or assets suffered by AIMPO, and to return funds recovered to the respective funding sources; and
- f) Issuance of Management Letters to allow departments concerned to take corrective actions and strengthen internal controls.

Approved by the Board of administration on/....../2020

Mr.....

Executive Director of AIMPO

Signature:

Mr.....

Deputy Executive of

Signature