

Annexes

Annex A: Reporting Flow (Summary)

1. Receive report (any channel) -> ensure immediate safety and non-retaliation.
2. Triage within 24-72 hours (as context allows): determine urgency, survivor needs, referral requirements.
3. Assign case manager (PSEA Officer or delegate) and open confidential case file.
4. Decide response pathway: referral only / internal inquiry / formal investigation / external reporting.
5. Implement interim risk management measures (e.g., duty changes, supervision).
6. Conclude case: outcomes and disciplinary actions; survivor support; document lessons learned.
7. Report anonymized trends and actions to the CEO/BoD as per protocol.

Annex B: Definitions

Child: Any person under the age of 18.

Vulnerable adult: An adult who may be unable to protect themselves from harm or exploitation due to age, disability, illness, displacement, or other factors.

Safeguarding: Actions taken to promote welfare and protect people from harm, exploitation, and abuse.

SEA: Sexual exploitation and abuse by humanitarian personnel against affected populations.

SH: Sexual harassment occurring within the workplace or related work contexts.

Survivor: A person who has experienced harm or abuse; the term emphasizes agency and dignity.

Complaints mechanism: A set of trusted channels for receiving, responding to, and learning from complaints and feedback.



Anti-Corruption and Anti-Fraud POLICY

Version: 1.0

Date: 2024-12-28



This document should be customized with operational contact details and aligned with applicable national laws in countries of operation.

Document Control

Document Title	Anti-Corruption and Anti-Fraud Policy
Designated Safeguarding Focal Point	Oversight & Audet Committee
Approved by	Board of Directors (BoDs)
Effective Date	28 December, 2024

1. Introduction and Policy Statement

Humanitarian Empowerment and Relief Team (HEART) enforce a robust Anti-Corruption and Anti-Fraud Policy to uphold its core values of integrity, inclusiveness, effectiveness, and innovation while supporting vulnerable communities. This policy mandates all employees to adhere to ethical standards, report suspected misconduct and consult related organizational policies for guidance. HEART ensures compliance through training, annual reviews, and disciplinary measures for violations, including termination and legal action. The organization aligns with both domestic and international anti-corruption laws, honors donor-specific obligations, and supports global conventions. It defines key terms like “Bribe,” “Fraud,” and “Anything of Value” to clarify expectations, prohibits improper payments and falsification of records, and requires due diligence and contractual safeguards when engaging with Project Partners and Service Providers to protect its reputation and resources.

2. Due Diligence & Written Agreements

To protect its integrity and resources, HEART enforces rigorous anti-corruption and anti-fraud due diligence for all prospective Service Providers and Project Partners before engagement. This risk-based process must be documented and regularly updated to demonstrate accountability to auditors and donors. Due diligence evaluates qualifications, licensing, reputation, financial practices, conflicts of interest, affiliations with Public Officials, and alignment with HEART’s mission, using tools such as questionnaires, reference checks, public records, and site visits. Additionally, HEART requires all contracts, especially those exceeding \$2,500, to be in writing and include mandatory clauses ensuring compliance with its policies, the right to remove implicated personnel, submission of original receipts, and termination rights for violations. Audit provisions and donor-specific requirements, such as anti-money laundering and anti-terrorism clauses, must also be incorporated where applicable to uphold transparency and compliance.

3. Accurate Record-Keeping and Payment Processing Procedures

HEART shall make and keep books, records, and accounts which, in reasonable detail, accurately reflect any transactions involving expenditure on behalf of the Organization, including all expenditures related to Service Providers and Project Partners, and the reasons or justifications for such expenditures, and all contracts, invoices, and receipts relating to the

purchase of goods and services. No payment or receipt on behalf of HEART may be approved or made with the intention or understanding that any part of that payment or receipt is to be used for a purpose other than that described in the relevant books and records. HEART also should devise and maintain a system of internal accounting controls sufficient to provide assurances that transactions are properly authorized and recorded.

4. Reporting, Investigation, and Disciplinary Action

HEART employees are required to promptly report any known or suspected instances of corruption, fraud, or other illegal, unethical, or improper conduct, all of which will be reviewed and investigated with confidentiality maintained to the extent possible. Reports should include detailed information and supporting documentation to facilitate effective inquiry. Failure to report or any breach of this Policy is considered a serious offense and may result in disciplinary action, including termination. For questions or to report concerns, employees should contact the Head of Office, Internal Auditor/Compliance Officer, or Executive Director or follow the procedures outlined in HEART's Whistleblower and Anti-Retaliation Policy.

5. General Do's and Don'ts

To uphold HEART's integrity and prevent corruption or fraud, employees must follow a clear set of ethical guidelines. They are expected to report any suspicious interactions, potential conflicts of interest, or violations of policy to the Internal Auditor/Compliance Officer or Executive Director, and to seek guidance when unsure about the appropriateness of engagements with Public Officials or Service Providers. Due diligence must be conducted before entering into agreements, which should be written, detailed, and include anti-corruption provisions. Payments and benefits must serve legitimate business purposes, comply with local laws, and be properly documented. Employees must manage HEART's resources responsibly and adhere to financial and procurement procedures. Conversely, they must not ignore signs of misconduct, conceal conflicts of interest, engage with flagged entities without approval, sign documents they don't understand, misuse their position, or offer or accept anything of value in exchange for advantage. Providing benefits to family members of officials or making facilitation payments is also prohibited unless explicitly authorized.

6. IS THE COMPANY A LEGITIMATE BUSINESS, WITH THE CREDENTIALS AND EXPERIENCE IT CLAIMS IN ITS BID OR PROPOSAL?

To detect shell companies that often create fraudulently secure contracts, HEART advises conducting straightforward verification checks that expose inconsistencies in a firm's legitimacy. These include confirming the company's online presence aligns with its claimed size and experience, checking listings in business directories and Chamber of Commerce records, verifying contact details through reverse searches and using maps or satellite tools to inspect the physical premises. These practical steps help HEART avoid partnering with disreputable entities and safeguard its operations from financial and reputational risks.

To ensure partnerships align with their mission and uphold transparency, HEART conducts comprehensive background checks on prospective Service Providers and Project Partners. These checks verify business legitimacy through site visits, directory listings, and satellite

imagery; investigate past misconduct via internet searches, local media, and stakeholder references; and assess operational capacity by reviewing experience, staffing, resources, and certifications. On-site evaluations and reference checks are especially important for smaller or local firms not visible online. This multi-layered due diligence process helps HEART mitigate financial and reputational risks while demonstrating accountability to donors and auditors.