



FRAUD POLICY

Policy:

It is the policy of International Medical Corps to provide guidance and assistance in recognizing and reporting fraud. *All staff are required to report any instance of fraud or suspected fraud.*

This policy is intended for all International Medical Corps employees, consultants, volunteers or any third party or person who works with International Medical Corps in any country and at any level.

Comment:

Fraud is defined as a misrepresentation or concealment of material facts with the intent to deceive and obtain an unauthorized benefit. It could involve deliberate and deceptive acts, such as forgery of a financial document, with the intent to obtain a benefit, such as money, property or services. Misrepresentation could be false presentation, concealment, or non-disclosure. Examples of fraud include, but are not limited to:

- (1) Making or altering documents or computer files with the intent to commit fraud;
- (2) Intentional misappropriation or misuse of International Medical Corps resources, such as funds, supplies or other assets;
- (3) Intentional mishandling of contract obligations and relations with third parties, resulting in loss of assets or personal gain;
- (4) Improper handling or reporting of cash transactions;
- (5) Purposefully inaccurate financial reporting;
- (6) Authorizing or receiving compensation for goods not received or services not performed;
- (7) Accepting or giving a bribe or kickback.

Reporting Responsibilities:

- (1) International Medical Corps managers and supervisors at all levels are responsible for continually emphasizing the Code of Conduct of International Medical Corps as a standard of performance for all staff;
- (2) All staff are required to report any instance of fraud or suspected fraud;
- (3) The person who discovers a case of fraud or suspected fraud should report the discovery to their immediate supervisor;

- (4) If reporting to the manager or supervisor is not possible and/or the person reporting wishes to remain anonymous, the **International Medical Corps Reporting Hotline** is a comprehensive reporting system in which staff can file secure, anonymous reports via phone or Internet. This system is hosted and managed by EthicsPoint—a leading industry provider of confidential reporting systems. Hotline specialists can be reached 24 hours per day, 7 days per week to assist with reporting, as well as to provide guidance on whether a situation may be a cause for concern.

How to submit a confidential report anytime from anywhere:

- Via phone: Call your respective country hotline at the number listed at www.internationalmedicalcorps.ethicspoint.com
- Via Internet: Go to www.internationalmedicalcorps.ethicspoint.com > “File a new report”

If access to the above EthicsPoint portal or telephone number is not possible, please contact report@internationalmedicalcorps.org for further instruction, or contact Petar Ivankovic, Compliance Auditor at +385 21 455 281 or pIvankovic@InternationalMedicalCorps.org with any questions.

- (5) All information received will be reviewed so that an appropriate investigation may, if warranted, be conducted.
- (6) All staff have an obligation to cooperate fully in the investigation process. Failure to cooperate will result in disciplinary action, up to and including termination;

(7) **SAFEGUARDS**

- (a) **No Adverse Action**
No adverse employment action, such as termination or counseling, will be taken against any staff member in retaliation for reporting allegations which the staff member reasonably believes to be true.
- (b) **Harassment**
Harassment of any staff member who has reported a concern in good faith will not be tolerated. If harassment is found to have occurred, appropriate disciplinary action, up to and including termination, will be taken against the harasser.
- (c) **Confidentiality**
International Medical Corps will maintain confidentiality in the investigation of any allegation. Investigations and the results of investigations will be discussed only with those who are on a need-to-know basis.
- (d) **Anonymous Allegations**
Staff are encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.
- (e) **Malicious Allegations**

Individuals making allegations with reckless disregard for their truth or falsity may be subject to disciplinary action, up to and including termination, by International Medical Corps.

- (8) Violation of this policy will result in disciplinary action up to and including termination and may constitute a violation of applicable law.