



Promoting Resilient Preparedness

Anti-Bribe and Fraud Policy

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Promoting Resilient Preparedness (PRP)

Anti-Bribe and Fraud Policy

1. Scope of the Policy and Statement

PRP's commitment to preventing bribery and fraud is outlined in this policy, which covers all such activities within the organization. PRP ensure proper record-keeping for our Program, Administration/Logistics, HR, and Finance functions, with strong internal controls consistently applied through our policies and procedures.

2. Definitions

- a) **Bribery**. It's an act committed to secure personal gain or favors (internal or external), directly damaging PRP's interests and integrity. This undermines our credibility by influencing actions and performance through financial or administrative advantages.
- b) **Fraud**. An act committed through Ponzi schemes, Scams, exploiting loopholes; forging signatures, fabricating documents and breaching trust for personal monetary gain.

3. Detection of Act of Bribery and Fraud:

a. Reporting and Whistleblowing

At PRP, we expect all staff to report any concerns or suspicions regarding bribery or fraud, regardless of who is involved. It's crucial that all suspicious behavior is addressed without delay. Initially, reports should go to your immediate supervisor. If there's no action, you must escalate the concern to the next management level. Should these channels fail to respond, the Chief Executive or Board will be brought in. We also assure whistleblowers that they can share information with any trusted individual within the organization.

b. Reporting the Act

Any event of bribery or fraud shall be immediately reported to the relevant supervisors and HR department. HR department shall forward all such complains to the Chief Executive (CE). The CE after reviewing the information and its source shall immediately constitute a committee comprising of relevant/experienced staff members.

c. Agreed Terms Of Reference (TOR)

The committee shall devise a TOR of the assignment in consultation with the CE and seek her/his approval. All the individuals involved shall maintain confidentiality of the document/process.

The constituted committee will work on the reported act and submit a detail report to the CE. The investigating time on the act may vary from the case to case.

d. **Stakeholders Engagement**

The relevant stakeholders including relevant internal departments and external entities, such as donors, partners, community organizations, vendors, etc. shall be taken on-board, if required.

In case, the bribery/fraud pertains to the funds or activities of the donor, the relevant donor shall also be referred to after the in-house consultation process between the members of the inquiry committee and the relevant project team. The signed contribution agreements, guideline or manuals shared by the donor may also be referred to for compliance.

4. **Drafting of Inquiry Report Covering Following Contents**

- a. Scope of the inquiry as per TOR
- b. Summary of key findings
- c. Detailed observations
- d. Evidence (attached as annexes)
- e. Recommendation and conclusion in light of PRP Policies and Procedures, donor agreements & guidelines and the law
- f. In such cases where the legal matters may involve, The legal advisor shall be consulted and engaged on such matters , submission of evidence and key findings to enable the legal advisor to refer relevant laws and determine consequences for the organization, in case either party opts for litigation. Where the accused admits and agrees to a resolution of the matter, an out-of-court settlement might be considered, i.e. in consultation with the legal advisor. The aspect of cost-effectiveness may also be considered while deeming litigation as an option, i.e. in consultation with the legal advisor.

5. **Hearing Opportunity:**

The accused shall be provided with an opportunity to meet the committee members to defend her/him against the allegations. In this case, a maximum of two opportunities may be given with following intervals:

- a. After finalization of Inquiry report within a week's time subject to availability of all concerned individuals
- b. One week after the previous hearing.

6. **Possible Actions by the Management**

The management shall review the recommendations and conclusions of the committee and agree or disagree that the allegations are upheld. The accused may be subject to formal action which could also ultimately include dismissal or legal action, whichever is advised.