

Anti-Fraud Policy

Document Owner: Business Incubation Association in Tripoli (BIAT)

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Authorized by: Dr. Fawaz Hamidi- BIAT Chairman

Status: Effective

General Description

The NGO is committed to its anti-fraud policy, thereby promoting the integrity of humans.

Description:

Any fraud in BIAT's operations depletes funds and other resources intended for supporting BIAT's mission. Thus, as in other organizations, fraud can undermine its effective functioning and divert scarce and valuable resources from its mission. Moreover, fraudulent and corrupt behavior can seriously damage BIAT's reputation and diminish donors' trust in its ability to deliver results in an accountable and transparent manner.

Responsibility:

All BIAT personnel are the stewards of the public and private resources entrusted to the organization. Hence, they are accountable for their proper, effective and efficient use for achieving the intended outcomes of BIAT's programs and projects.


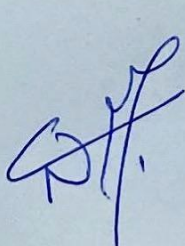
The BIAT policy on fraud and other corrupt practices (the BIAT Anti-fraud Policy) is an important part of BIAT's corporate governance, establishing the framework for preventing, identifying, reporting and effectively dealing with fraud and other forms of corruption. It is in line with the BIAT Accountability System, adopted by the Executive Board to support ethical values and standards, increase transparency and proper stewardship of resources, as well as to clarify and align all relevant activities.

BIAT recognizes fraud as:

any act or omission that intentionally misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation. Corrupt practices are generally understood as the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party. In this Policy, fraud is defined in a broader sense and includes, but is not limited to, theft, embezzlement, forgery and corrupt practices.

Examples of fraud include but not limited to the following:

- Offering or receiving something of value to improperly influence a procurement process;
- Asking for or receiving money for providing information to a vendor in the procurement of goods and services;



- Asking for or receiving personal reward or other private gain in return for showing favor to a candidate in a recruitment process;
- The misuse or theft of a password for the unauthorized access to IT systems;
- Collusion or other anti-competitive scheme between suppliers during a tender process;
- Stealing or misappropriating BIAT assets.

BIAT fraud prevention measures include;

- Fraud awareness communication and training
- Management of the risk of fraud and corruption
- Internal control system
- Preventing conflicts of interest
- Integrity as a key criterion in selection procedures

BIAT is committed to preventing, identifying and addressing all acts of fraud against BIAT, whether committed by BIAT staff members or other personnel or by third parties. BIAT has zero tolerance for fraud, meaning that all incidents of fraud are to be reported and will be investigated in accordance with established investigation guidelines. To this effect, BIAT is committed to raising awareness of fraud risks, implementing controls aimed at preventing fraud, and establishing and maintaining procedures applicable to the detection of fraud and the enforcement of this Policy.

This Policy applies to all activities and operations of BIAT, including any project funded by BIAT, any project implemented by BIAT, and any implementing partner. The Policy aims to prevent and detect fraud: involving BIAT staff members and its personnel and perpetrated against BIAT by contractors, suppliers of goods and services, implementing partners, or other third parties.

Should the fraud be at the level of employees, the incident is to be reported to the HR Manager and Board of Directors jointly. Should any member of the Board of Directors be fraudulent, the incident is to be reported to other members of the Board.



The bottom of the document features two handwritten signatures in blue ink. Between the signatures is a circular blue stamp. The stamp contains the text "Tripoli Business Incubation Association" around the perimeter and "BIAT" in the center, with a stylized logo above the acronym. The word "Jasri" is written in cursive to the right of the stamp.