



AFR

Anti-Fraud, Bribery and Anti-Corruption Policy



ACCESS TO FINANCE RWANDA

AFR anti-fraud, bribery and anti-corruption Policy

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List of contents

Acronyms	4
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1. Introduction and general overview	5
2. Definitions of corruption, fraud, bribery	6
3. Actions constituting a fraud	6
4. Zero tolerance on fraud or bribery	7
5. Anti-bribery policy	8
6. Conflicts of interest	8
7. Gifts and entertainment	8
8. Fraud response team	11
9. Reporting fraud & bribery to donors	11
10. Conducting investigations	12
11. Reporting and acting on findings of investigations	14
12. Induction, training and awareness	15
13. Disciplinary process	16
14. Grievance process	16
15. Contracts	16

Appendix 1: Glossary	17
Appendix 2: Examples of fraud and bribery	18
Appendix 3: Zero tolerance declaration form	19
Appendix 4: Fraud & bribery register	20
Appendix 5: Allegation or concern response checklist	21
Appendix 6: AFR gifts, benefits and hospitality register	22

Acronyms

AFR	Access to Finance Rwanda
COO	Chief Operations Officer
HR	Human Resources Department

PART I

1. Introduction and general overview

1.1. Purpose

1.1.1 Fraudulent, corrupt and/or collusive practices are contrary to AFR's core values. AFR recognises the adverse effect that such practices could have on its activities and operations, and is committed to preventing them and taking robust action where they are found to occur. In particular, AFR is committed to preventing:

- fraud and corruption perpetrated by AFR staff members and non-staff members;
- fraud perpetrated against AFR by partners, suppliers or other third parties; and
- any collusive practices among any such parties. AFR is committed to transparency and accountability in the management of its resources in order to ensure the effective fulfilment of its Strategic Objectives.

1.1.2. To this end, this policy seeks to prevent fraudulent, corrupt and/or collusive practices through:

- appropriate internal checks and balances;
- staff training and awareness;
- due diligence practices in the recruitment of AFR staff members, non-staff members and the hiring of contractors; and
- effective internal and external auditing controls. This policy is consistent with other relevant internal rules and policies.

1.1.3. AFR anti-fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against AFR. It is the intent of AFR to promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

1.2. Scope of this policy

1.2.1. This policy applies to all relevant persons of AFR. Relevant persons include staff, board members, volunteers, and short term contractors.

1.2.2. Part I includes sections that are useful for and made available to all relevant persons, as well as being publicly available on the website.

1.2.3. Part II includes sections that are used for the board and Senior Management Team in responding to allegations and incidences of fraud, and building an anti-fraud culture.

1.3. Commencement of the Manual

- 1.1.3. The manual shall be effective on the date it is approved by the Board and will be enforced within the entire organisation.

1.4. Procedures for Review and Update

- 1.4.1. This manual is subject to review and update as needed or at least every five years in order to allow AFR achieve its objectives.

- 1.4.2. If procedures are unclear or appear to be misinterpreted, the Chief Operations Officer (COO) must be contacted directly for clarification and, if necessary, an amendment or deletion will be issued. The steps to follow to update the manual are as follows:

- Contact the COO with the proposed changes to be made;
- The COO will review, and recommend the proposed changes, to management if deemed necessary;
- Approval of the Board of AFR is requested before proceeding with the changes; and
- Updated manual is shared with all Head of Departments after changes have been made.

- 1.4.3. All changes to this manual shall be carried out in line with the procedures set out under Version Control sheet.

2. Definitions of corruption, fraud, bribery

- 2.1. Definitions of corruption, fraud and bribery are found in Appendix 1.
- 2.2. It is also bribery to make unofficial payments (known as 'grease' or 'facilitation' payments) to a public official to secure or speed up a routine action to which you may be entitled – for example, you pay a public official a small "fee" to speed up the issuing of a visa.
- 2.3. Some examples of fraud and bribery relevant to AFR are described in Appendix 2.

3. Actions constituting a fraud

- 3.1. The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:
- Any dishonest or fraudulent act;
 - Misappropriation of funds, securities, supplies, or other assets;
 - Impropriety in the handling or reporting of money or financial transactions including forgery or alteration of accounting record or vouchers;
 - Profiteering as a result of insider knowledge of company activities;

- Disclosing confidential and proprietary information to outside parties;
- Disclosing to other persons securities activities engaged in or contemplated by AFR;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company. Exception: Gifts less than \$50 in value;
- Payment or receipt of bribes, kickbacks or other inappropriate payments;
- Participation in sham or fraudulent transactions;
- Deceptive, misleading or false statements about corporate transactions;
- Non-disclosure of material information needed for an informed investment decision; and
- Other fraud behaviours causing loss to AFR interests.

4. Zero tolerance on fraud or bribery

- 4.1. AFR's position to fraud and bribery is to take a zero-tolerance approach and AFR is committed to pursuing this approach throughout its operational practices for the following reasons:
- AFR recognises the significant risk that fraud and bribery pose to the achievement of its aims and objectives. Any money that is lost to fraud or bribery is money that cannot be used to achieve our objectives.
 - Corrupt behaviour also seriously damages our reputation. The eradication of fraud and bribery in the way we operate is of great importance to securing the trust and confidence of all our stakeholders.
 - We owe it to the communities that we operate in not to condone fraud or bribery. Corruption creates unstable societies. It destroys public and business standards, and forces ordinary people to use resources that they can ill afford in their interactions with the government and other public bodies.
- 4.2. All members of staff and the board, together with volunteers and contractors are required to sign the zero-tolerance declaration form (Appendix 3) during induction and annually thereafter on 1st January of each financial year.
- 4.3. We support the application of the zero-tolerance policy by providing:
- Direction and rules to clearly establish appropriate and expected behaviour.
 - Effective deterrents to inappropriate behaviour in the form of meaningful consequences.
 - Prevention measures to reduce the risk of fraud or bribery occurring.
 - Detection measures to identify fraud or bribery if it happens, including speaking up lines.
 - Response measures to ensure we react well to suspicions, allegations and proven incidents of fraud & bribery, including protection and fair treatment for accusers and accused.
 - Measurement processes to evaluate the impact and success of our anti-fraud & bribery policy and management of risk.
 - Deliberate proactive steps to embed anti-fraud & bribery thinking into our culture, including staff training and awareness.

- 4.4. Anyone found guilty of fraud or bribery will be subject to disciplinary measures which will ordinarily include dismissal, prosecution and recovery of losses.

5. Anti-bribery policy

- 5.1. AFR employs all legal and safe tactics to avoid and resist paying bribes to Public and Private Officials, even if it results in denials, delays, inconvenience, and increased cost to our operations.
- 5.2. No relevant person is authorised to pay a bribe on behalf of AFR, or using AFR funds.
- 5.3. Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

6. Conflicts of interest

- 6.1. Refer to the conflict of interest guidelines.

7. Gifts and entertainment

- 7.1. Gifts and entertainment should never be used or allowed to influence business decision making.
- 7.2. When offers of gifts and entertainment are made or accepted in situations where they are not appropriate, they can look like, or may in fact be, bribes. They can expose us to accusations of unfairness or even break the law, and can put at risk our reputation for ethical behaviour.
- 7.3. Positive, healthy, normal business practices can include accepting and making offers of gifts and entertainment, which develop and maintain positive and strong business relationships. We should be able to accept and make offers of gifts and entertainment ONLY when they are appropriate, i.e., when they:
 - are proportionate in the context; and
 - do not create any sense of expectation or obligation on the recipient or the giver.
- 7.4. The following gifts may never be offered or accepted, and will always be deemed inappropriate.
 - Cash of any amount;
 - Any gift with a value exceeding USD 50 (or equivalent in local currency);
 - Any entertainment worth more than USD 100 (or equivalent in local currency);
 - Any gifts or loans from existing suppliers or prospective suppliers while a tender process is underway;

- Any gifts or loans to staff involved in supplier selection decisions (e.g., Procurement Officer or member of Procurement Committee); and
 - Entertainment involving gambling, anything of a sexual nature or exploitation of others.
- 7.5. It is never allowed to request for a gift or entertainment.
- 7.6. Gifts or entertainment below the limits referred to in Section 7.4 above are not necessarily appropriate.
- 7.7. In some circumstances an element of judgement is required to decide whether a gift is appropriate or not. If any staff is in any doubt, they should consult the COO (or the Board chair in the case of the Chief Executive Officer) and obtain written permission before accepting or offering a gift.
- 7.8. The following circumstances imply the giving or receiving of a gift or entertainment offer may be appropriate:
- The giving and receiving of the gift or entertainment strengthens a genuine business relationship;
 - The gift or entertainment does not constitute an attempt to apply undue influence, and does not create an undue obligation;
 - The gift or entertainment is given or accepted in the open rather than in secret;
 - The gift or entertainment is given to celebrate a recognised cultural event such as Christmas or New Year;
 - The gift or entertainment is given to the organisation or a group of people (department) rather than an individual;
 - The gift or entertainment is branded marketing materials (pens / notebooks etc.);
 - The value of the gift or entertainment is not excessive or abnormal in social context; and
 - The timing of the gift or entertainment is not suspicious.
- 7.9. The following circumstances imply the giving or receiving of the gift or entertainment may be inappropriate:
- The timing, nature or circumstances of the gift means it could be perceived as an attempt to influence a business decision;
 - The value of the gift is excessive in the circumstances (despite being below the limits referred to in Section 7.4)
 - The receiver feels obligated, or the giver feels entitled; and
 - The gift is given or received in secret.
- 7.10. If any staff or Board member is offered an inappropriate gift, they should politely decline it and inform their line manager or Board chair.
- 7.11. In the event that declining an inappropriate gift in the moment that it is given might be culturally inappropriate or embarrassing, it should be returned within no less than a week, with appropriate documentary evidence to prove that the gift was returned.

- 7.12. In the event that an inappropriate gift is received publicly, steps should be taken to restore the reputation of AFR, in addition to returning the gift.
- 7.13. In the event that inappropriate gifts, benefits and hospitality are received without consent (such as courier deliveries, bank or mobile money transfers), these should be declared immediately using the gifts, benefits and hospitality register in appendix 6 conflict of interest declaration form. Steps should be taken to return the gift, or notify authorities if money laundering is suspected.
- 7.14. Inappropriate gifts received by employees and subsequently declared should not be received into the AFR's funds – rather they should in all cases be returned.
- 7.15. Appropriate gifts, given to as a whole, or to a particular team, should normally be enjoyed or shared by all relevant staff members (e.g., hampers or flowers). Where an appropriate item is not easily sharable, it should be raffled by some random and transparent means.

PART II

8. Fraud response team

- 8.1. Once a concern has been reported or otherwise identified, the responsibility to respond to that allegation will fall to the Fraud Response Team.
- 8.2. The Fraud Response Team will be convened by the Chief Executive Officer, or a board member in the event that the CEO is involved. The Fraud Response Team should comprise 3 individuals from the Senior Management Team (SMT) or Board of Directors. Any relevant person implicated in an allegation may not be a member of the Fraud Response Team.
- 8.3. The roles and responsibilities of the Fraud Response Team are to:
 - Update the Fraud & Bribery Register in Appendix 4
 - Document meetings, decisions and learning
 - Maintain confidentiality, especially with respect to the reporting person and the person accused of alleged misconduct
 - Ensure the reporting person is supported and protected from harm
 - Take urgent steps to protect assets or information as needed
 - Communicate with donors and manage other internal and external communications as appropriate
 - Make preliminary investigations
 - Decide whether or not to conduct a full investigation
 - Set up the Terms of reference and/or contract for the investigation
 - Act on the findings of the investigation.
- 8.4. The Fraud Response Team will use the checklist in Appendix 5 as an “aide memoire” of the issues to consider when responding to an allegation of misconduct.
- 8.5. A case file should be opened to hold all emails, meeting minutes, reports, and other information relevant to the case. The file should be held in a safe and secure place.
- 8.6. All reported or otherwise identified allegations, suspicions or concerns should be brought to the attention of the board, maintaining confidentiality but updating them about actions taken until the issue is closed.

9. Reporting fraud & bribery to donors

- 9.1. AFR takes its contractual and fiduciary responsibility to report fraud and bribery to donors very seriously.

- 9.2. The Fraud Response Team's duty for communicating with donors should include the following actions:
- Appoint a donor contact person to channel all communication with the donors with respect to the suspected fraud or bribery.
 - Consult the donor agreement with respect to terms and conditions about reporting suspected fraud or bribery, and ensure that they are met. If in doubt, communicate within 48 hours, if the fraud may have an impact on a particular donor's funds.
 - Protect the identity of the suspect and reporting person. Avoid sharing any confidential details.
 - Reassure the donor by explaining the process being followed to handle the allegation.
 - Confirm verbal communications in writing.
 - Keep the donor updated with progress, and the outcome of the investigation.
- 9.3. The full investigation report or disciplinary report should not be shared with the donor unless required to do so, and if so, only in an anonymised form.
- 9.4. Fraudulent losses that are disallowed by donors can only be financed from unrestricted funds.
- 9.5. AFR will take out a fidelity insurance policy to mitigate the impact of losses from fraud or bribery.

10. Conducting investigations

- 10.1. The purpose of conducting an investigation is to gather evidence and facts to establish whether suspicions or allegations are true, and whether any proven incidents are isolated or more widespread.
- 10.2. All investigations should be impartial, thorough, timely and confidential.
- 10.3. Any relevant persons investigated will be considered innocent until proven guilty. False or mistaken accusations are not uncommon.
- 10.4. All reported allegations or suspicions of misconduct should normally be investigated. This includes even cases where:
- There is belief that the genuine concern may have been reported due to malicious motives.
 - The allegation relates to attempted fraud or bribery.
 - The accused staff member has since left AFR.
- 10.5. The Fraud Response Team may decide not to investigate only in exceptional cases where a reported allegation or suspicion:
- Is frivolous, trivial or has clearly arisen from a misunderstanding.
 - Is wholly unbelievable, i.e., there is no conceivable way the facts it related to could have occurred.
 - has been raised anonymously and there is insufficient information to investigate.

- 10.6. Investigations may be carried out by in-house staff, the internal auditor (which may be an outsourced function), an audit firm, donor, or a specialist investigation firm, depending on the case.
- 10.7. Investigators should be objective and unbiased, thorough, able to maintain confidentiality, competent in investigative techniques, empowered with sufficient seniority and confidence, honest persons of integrity, and independent of any possible subsequent disciplinary process.
- 10.8. The Fraud Response Team should set out a clear terms of reference for the investigator including background, allegations made, scope of investigation, and the timeline for expected work and reports.
- 10.9. Care should be taken not to compromise admissibility in court of all evidence collected. This might include for instance:
- Taking two full backups of hard drives / electronic files – one which is left untouched and the other which is used for the investigation.
 - Keeping documents in the files they were filed in, in the order they were filed in. If documents are removed, take a note of where they were located.
 - Adding hole punches to or writing comments on documents which may be admitted as evidence.
 - Considering fingerprint contamination if appropriate.
- 10.10. The following factors should be considered in deciding whether or not to suspend staff:
- Could the staff member's presence in the office result in risk of loss or damage to evidence, influencing of witnesses, or interfering with the investigation in any way?
 - Would the impact on other staff or operations be excessive?
 - Are there local labour laws regarding the maximum length of any formal suspension?
 - Have other alternatives been considered, such as sending the staff on a training or work trip, or requiring them to take leave?
- 10.11. The legal and other rights of interviewees should be considered when conducting interviews during an investigation. This might include among other things ensuring that:
- All interviews are completely and accurately documented
 - There is a complete ban on coercion or coercive techniques
 - The assistance of a translator is provided if necessary
 - The date, time and location of interviews are unless required within office norms
 - The interviewees' wish or right to have a witness or lawyer present is respected as appropriate.
- 10.12. A formal documented investigation report should be submitted to the Fraud Response Team, according to the timing agreed, which outlines the findings, facts and conclusions of the case.
- 10.13. The investigation report should make recommendations about weaknesses. It should avoid making any recommendations associated with disciplinary consequences.

11. Reporting and acting on findings of investigations

- 11.1. Any suspected fraud, bribery or corruption will be reported using AFR's hotlines outlined in the Whistleblowing policy and managed by an independent firm
- 11.2. The Fraud Response Team will agree on the appropriate actions to be taken in light of the findings of an investigation.
- 11.3. Where fraud is collusive and involves more than one staff member, junior employees should never be used as a scapegoat to protect more senior employees.
- 11.4. The Fraud Response Team may choose to offer concessions to witnesses who are prepared to give information or evidence about other staff, provided the evidence is proved correct and leads to disciplinary action against those other staff.
- 11.5. On receiving the investigation report, the Fraud Response Team may choose to take the following actions, as appropriate to the case:
 - Take legal advice.
 - Pass the matter to the HR department to take action against guilty individuals, in accordance with the disciplinary policy, which should usually be dismissal.
 - Organise appeal hearings in accordance with disciplinary policy, in case individuals appeal.
 - Clear the reputations of those accused but found to be innocent of wrong doing.
 - Recover losses from individuals.
 - Prosecute in courts of law.
 - Make improvements to internal control systems to ensure that similar frauds do not happen again.
 - Implement recommendations from investigation report.
 - Communicate with donors, staff, and public as necessary.
 - Discuss with donors with respect to treatment of fraudulent losses, making repayment if required.
 - Make a claim against fidelity insurance policy.
 - Initiate the recruitment to replace terminated staff (by HR department).
 - Initiate the revision of budgets and cash flow forecasts (by finance department).
- 11.6. All decisions and actions of the Fraud Response Team shall be documented and filed on an incidence file.
- 11.7. A one-page summary of the case (allegation, response and outcome) should be prepared, shared with the board and filed on the front of the incidence file.

12. Induction, training and awareness

- 12.1. All relevant persons should receive training in the following elements (starred items at induction):
- Definitions of fraud & bribery, with relevant examples
 - Relevant sections of this policy (zero tolerance, conflicts, gifts, whistleblowing)
 - Reporting suspicions
 1. What to report
 2. How to report
 - Confidentiality and protection
 - Signing declarations (code of conduct, conflict of interest, zero tolerance etc.)
 - Fraud triangle & Zero tolerance principle
 - Role play reporting a fraud to explore associated emotions
 - Building confidence to report by explaining key steps of how reported suspicions are handled, e.g., fraud response team commissions fair and unbiased fact finding investigation, and appropriate action taken.
- 12.2. In addition, the following topics should be covered for every manager (starred items should be covered as part of the manager's induction):
- What to do if someone reports a suspicion to you
 - Maintaining confidentiality
 - Supporting and protecting people who speak up (whistleblowers)
 - Communication with donors, staff, public, suspect/s, reporting person
 - Roles and responsibilities of the fraud response team
 - Documentation (incidence report, fraud register)
 - Investigations
 - Actions to take after an investigation
- 12.3. Refresher training will be organised for all staff at least every 2 years.
- 12.4. The HR and Administration unit will monitor to confirm everyone has received appropriate training.
- 12.5. Part 1 of the anti-fraud & bribery policy shall be available from our website, stored in a shared location on the organisation's server, and emailed to all staff at induction and before trainings.
- 12.6. Part 2 of the anti-fraud & bribery policy shall be shared with, and accessible to all relevant managers, but should not be shared publicly or with all staff.
- 12.7. Day to day awareness of anti-fraud & bribery culture will be encouraged by the following:
- Standing item on SMT meeting agenda of 'fraud risk'
 - Anti-fraud & bribery posters in the office.

13. Disciplinary process

- 13.1. Where evidence of fraud or bribery is discovered, AFR's disciplinary policy should be followed.
- 13.2. In accordance with AFR's zero tolerance policy, the usual outcome for committing, or attempting to commit fraud or bribery, or deliberate abuse of the speaking up lines, will be dismissal.
- 13.3. In the event of collusion or coercion, consideration may be given to a degree of leniency if it results in information against a more senior staff member.

14. Grievance process

- 14.1. If staff feel they have been unfairly treated during a fraud or bribery response, they may take recourse in line with the Grievance Policy.

15. Contracts

- 15.1. All standard staff contracts should include a clause which allows AFR to terminate the agreement with immediate effect if the employee commits any act of gross misconduct, including fraud, bribery or theft.
- 15.2. AFR supplier application form or contract should overtly discourage any form of misconduct. The following clauses will be included:
 - We will provide quotations at best value when requested.
 - We will accept payment by cheque or bank transfer.
 - We will not offer or pay any incentive to AFR or its officers, either to win bids to supply goods or services, or as personal gifts or loans.
 - We will not provide quotations in return for favour or payment from AFR or its officers.
- 15.3. The sub-grantee application form and sub-grantee grant agreements or contracts should include the following clauses:
 - AFR awards grants and contracts on a free and fair basis, without requesting or accepting any payment or favour. In the event that a partner is requested for any kind of payment or favour as a condition or implied condition for being awarded a grant or contract, the partner should contact the Chief Executive Officer on [iyacu@ afr.rw] immediately.
 - The partner must notify AFR as soon as it becomes aware that a fraud is likely to have occurred which may have an impact on the project and / or funds of AFR.
 - The partner is responsible to refund any fraudulent losses.

Appendix 1

Glossary

Term	Definition
Attempted fraud or bribery	An unsuccessful effort to commit fraud or bribery.
Bribery	The unlawful act of offering or receiving any gift, loan, fee, reward or other advantage (taxes, services, donations etc.) to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of one's duties.
Corruption	The abuse of entrusted power for private gain.
Embezzlement	To steal money that people trust you to look after as part of your work.
Entertainment	Invitations to attend events with a social aspect, such as meals & conferences, as well as entertainment events such as shows or games, which are offered free of charge or at reduced rates.
Error	An accidental mistake, for example in a calculation or a decision.
Extortion	Act of utilizing one's access to a position of power or knowledge, either directly or indirectly, to demand unmerited cooperation or compensation as a result of coercive threats.
Fraud	The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise).
Gift	Goods, services or cash offered to or by staff or board members, or their friends or family or associates, at free or preferential rates. Unpaid loans are considered gifts for the purposes of this policy.
Money Laundering	The concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.
Negligence	Failure to give care or attention, especially when this causes harm or damage.
Nepotism	Form of favoritism based on familiar relationships whereby someone in an official position exploits his or her power or authority to provide a job or favor to a family member, even though he or she may not be qualified or deserving.
Public Official	Any person holding any legislative, executive, administrative or judicial office, whether he/she is appointed or elected, permanent or temporary, paid or unpaid.
Robbery	The crime of taking money or property illegally, often by using threats or violence.
Theft	The crime of stealing.

Appendix 2

Examples of fraud and bribery

- A grant officer requires or accepts kick-backs from partners for grant awards or payment remittances.
- A staff member submits fake receipts in an expense claim.
- A manager requires a payment for authorising an expense claim.
- A staff or board member fails to disclose a conflict of interest with a partner, supplier or other staff member.
- A staff member bribes an auditor to ignore or fail to report an audit finding.
- A staff member colludes with a supplier to get a kickback on overpriced goods or services.
- An accountant records transactions in the accounting records they know to be false.
- An accounts staff member knowingly posts entries to incorrect codes in order to conceal fraudulent payments.
- A staff member driving on AFR business makes an unreceipted cash payment to a traffic officer to avoid a traffic offence fine, whether or not the expense is charged to AFR.
- An unofficial payment is made to a Government Officer to be allowed access to work in a particular district.
- An unofficial payment is made to the police or judiciary to facilitate the release from detention or dropping of charges against an AFR employee or Board member.

Appendix 3

Zero tolerance declaration form

Zero tolerance declaration

This form should be completed by new employees when they join AFR and by all employees before 1st January each financial year.

I, _____, understand that AFR has a zero-tolerance policy on fraud and bribery.

I understand that fraud includes a wide range of dishonest behaviour, including theft, making false statements, falsifying data, and using, for my own purposes and without permission, property that does not belong to me.

I understand that bribery includes a wide range of dishonest behaviour, including accepting or paying kickbacks and making unofficial payments to public officials.

I understand that, at AFR:

- Fraud and bribery are never acceptable.
- All activities that AFR undertakes in furthering its mission must be done with integrity.
- Resources must be protected and maximised for the benefit of our beneficiaries.
- Any employee found to have committed fraud or bribery will be subject to serious disciplinary action or termination of employment.

I understand that AFR strongly encourages me to speak up and report any genuine concerns or suspicions of fraud or bribery, sexual misconduct, harassment or illegal acts in the workplace.

I understand that I can report those suspicions verbally or in writing by contacting:

- Chief Operations Officer,
- Chief Executive Officer, or
- Hotline / email managed by an independent firm (Refer to the Whistleblowing Policy)

I understand that I may report anonymously, but I am encouraged to give my name to make investigation possible.

Signed: _____ Name: _____ Date: _____

Appendix 5

Allegation or concern response checklist

Checklist – responding to an allegation or concern

The Fraud Response Team is responsible for deciding the appropriate course of action on a case by case basis, in line with the policy. This checklist is an “aide memoire” only.

Issues to consider	
1. Obtain relevant facts from reporting person	
2. Re-assure reporting person their concern will be handled in confidence	
3. Document details on standard fraud incidence report	
4. Inform Chief Executive Officer or equivalent	
5. Record incidence in Fraud Register	
6. Convene Fraud Response Team	
7. Ensure urgent safeguarding of assets / evidence	
8. Decide whether to investigate	
9. Obtain legal advice	
10. Communicate with Board	
11. Communicate with Donor	
12. Communicate with, and consider rights of, accused	
13. Communicate with reporting person	
14. Communicate with staff? Public?	
15. Decide whether or not to suspend staff member	
16. Provide support to reporting person	
17. Appoint and engage investigator with clear TOR	
18. Conduct investigation	
19. Report to Rwanda Investigation Bureau (may be necessary to acquire evidence)	
20. Take corrective action to right any wrongs in this incident	
21. Take preventative action to prevent similar incidents in future	
22. Document and act on any other learning from the case	

Appendix 6

AFR gifts, benefits and hospitality register

Period:

Note: The register below shows gifts, benefits and hospitality and their value that have been accepted by AFR Staff and it is updated on quarterly basis.

Receipt of gifts, benefits and hospitality by AFR employees – RECEIVED				
Date of Receipt of Offer	Description of gift, benefit and/or hospitality offered	Reason for acceptance	Person/Organisation offering gift, benefit and/or hospitality	Value of gift, benefit and/or hospitality (\$)

Provision of gifts, benefits and hospitality by AFR employees - GIVEN				
Date gift, benefit and/or hospitality provided	Description of gift, benefit and/or hospitality Offered	Reason gift, benefit and/or hospitality was provided	Person/organisation gift, benefit and/or hospitality was provided to	Value of gift, benefit and/or hospitality (\$)

Access to Finance Rwanda

Access to Finance Rwanda
KG 5 Avenue, House No.13 Kacyiru
P.O BOX 1599 Kigali

Phone: +250 782 507 751
Email: info@af.rw
www.af.rw