



## **ANIS FOUNDATION INCORPORATED**

### **PORT MORESBY**

**Head Office Location:** Section 52, Allotment 18, Varahe Rd, Gordons  
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### **LAE**

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## **PROTECTION AGAINST FRAUD, BRIBERY, CORRUPTION AND OTHER UNETHICAL BEHAVIOURS OR PRACTICES (ANTI-CORRUPTION, BRIBERY AND FRAUD) POLICY**

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### **POLICY – APPLICATION**

To ensure that all behavior standards, business activities, practices, procedures processes, and approval of all documentation pertaining to monetary benefits or any other benefits are in line with best practice and within established procedures which are free of Fraud, Bribery, Corruption and Unethical Behaviors. It is the responsibility of all ANIS employees, consultants, contractors, partners or clients to raise alarm or report any fraudulent or bribery or corruptible practices or such other practices or activities or behaviors deemed unethical to a relevant ANIS Senior Manager or Human Resource Manager or Executive Director directly.

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### **PROCEDURE**

- 1.0** Employee or consultant or contractor of ANIS Foundation must report any activities deemed fraudulent, corruption or bribery or such other unethical behaviors or practices to a relevant senior manager or human resource manager or to the Executive Director.
- 2.0** Any suspicion of an unethical behavior that is detected at the workplace, it must be immediately reported to the Human Resource Manager or a Senior Manager or the Executive Director. Those who report such activities or incidences shall be protected by the Whistleblower Policy.
- 3.0** Upon receiving such information or complaint, the senior management of the organization shall immediately issue suspension notice (2 weeks without pay) to the alleged offenders and institute an internal investigation to ascertain facts about the fraudulent or corruptible activity
- 4.0** The investigation team shall comprise of an Internal Auditor or Finance Manager (if the allegation is of a monetary nature), Security & Systems Manager, Procurement Manager or HR Manager or a Senior Manager. In the event of a large sums of money involved an external investigating team shall be engaged or register with National Fraud Squad and they shall



conduct investigation. The National Fraud Squad shall arrest the alleged offenders and deny their bail application until ordered or allowed by Competent Jurisdiction or Courts.

**5.0** Whilst the investigation is proceeding the alleged offender (s) shall be barred accessing the organization's premises or work sites or vehicles or any other property of ANIS Foundation or its subsidiaries or partners or clients.

**6.0** Once the internal investigation report is provided for the value of money less as determined by the Executive Director and if they are found responsible for the fraudulent activity they shall be dismissed from employment and all entitlements be withheld and forfeited to the organization.

**7.0** After the external investigation conducted by Anti-corruption Fraud Squad is compiled and presented to the National Courts and the Courts find that they are guilty and convicted of the criminal offence, they shall be dismissed from office or employment and all entitlements be withheld and forfeited to the company if ordered by courts as restitution. However if proven innocent and the courts ordered for reinstatement then they shall be reinstated to their respective substantive positions with full entitlements as directed by the courts.

**8.0** Using bribery as a means of accessing information or processing payments or inducing approval in a more expeditious way beside adherence to normal process is prohibited and shall be reported immediately to the senior management. Bribery in a way of handing out cash, or obtaining commission, or an inducement gift or colluding and corroborative actions or such other action deemed inducement to change normal process or cause of action is a serious offence therefore if adequate evidence provided they shall be instantly dismissed from office or employment

**9.0** The names of the Fraudsters be publicized in the media and advise the public that they are no longer employees of the ANIS Foundation or its subsidiaries and enlist them in the Ban for Life list not to be rehired. These people shall not be issued with any references or certificate of service or such other documents having organization's logo or name on them.

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