ELOHIM FOUNDATION

Creating Alternatives, Promoting Sustainable Development.

ANTI-FRAUD POLICY

Effective Date: August, 2026.
Review Date: September, 2017, 2022**.**
Approved by: Board of Trustees**.**

ADDRESS:

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Document Control

The Head of Human Resources will be responsible for the periodic review of this document. **Document Responsibility**

Title	Anti-Fraud Policy
Policy Number	HR – 001/2025
Directorate	Chief Operating Officer (COO)
Unit	Human Resources
Manager	Head of Human Resources
Applicable to	Elohim Foundation, Consultant, Interns, Vendors, Partners, Secondees and other Stakeholders

Document Revision History

Version	Endorsed By	Meeting Reference	Date Endorsed	Approved By	Meeting Reference	Date Approved	Effective Date	Sections Modified
1				Bot		21-Nov-19	21-Nov-19	New Policy
2	Senior Leadership Team (SLT)	Online	19-Nov-25	Common Board of Trustees	CB-15	26-Nov-25	1-Dec-25	All Sections

1.Purpose

The purpose of the policy is to:

- Prevent, detect and respond effectively to all acts of fraud and corruption against the organizations.
- Create and support a workplace culture that promotes fair and just standards as outlined in the respective Code of Conduct.
- Protect Elohim Foundation Organization's assets, reputation and resources.
- Safeguard donors and stakeholder trust.
- Provide clear guidelines to staff, board members, interns, consultants, secondees, partners, vendors and stakeholders.
- As part of developing an anti-fraud culture, take the threat of fraud seriously and thus will take the strongest possible action against all types of employees and third parties who commit fraud.
- Promote consistent behavior by providing guidelines and assigning responsibility for the development of controls and conduct of investigations.

2.Scope

This policy applies to:

- Any contractual arrangements between Elohim Foundation with their partners, vendors etc.
- All activities and operations of Elohim Foundation including any project funded by Elohim Foundation any project implemented by Elohim Foundation and the cooperating partners.
- Any fraud, or suspected fraud, involving employees (our people) as well as stakeholders/ partners, consultants, secondees, associates, students/interns, vendors, suppliers, contractors, subcontractors and sourced services/ any other parties with a business relationship with Elohim Foundation
- This policy applies equally to members of the Board of Trustees (Bot).

3.Definitions

- **Fraud:** A deliberate intent to acquire money or goods dishonestly through the falsification of records or documents as well as acts, omission or deliberate interpretation that causes, enables, or contribute to the loss in proper use or unjustified reduction Elohim Foundation assets or resources. The deliberate changing of financial statements or other records by either; a member of the public, someone who works or is a volunteer for Elohim Foundation Fraud pertains to acts which aim to obtain an undue material or moral advantage by deliberately circumventing Elohim Foundation internal policies and procedures and applicable public laws. The criminal act is an attempt to deceive, and attempted fraud is therefore treated as seriously as accomplished fraud.

- **Fraudulent practice is** any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to deceive.

- **Collusion:** an agreement by two or more people or entities to defraud another or to do or obtain something not in line with Elohim Foundation procedures or forbidden by respective law.

- **Theft:** Dishonestly acquiring, using or disposing of physical or intellectual property belonging to Elohim Foundation or to individual members of the organization.

- **Corruption:** Abuse of entrusted power for private gain.

- **Misuse of assets:** Deliberately misusing materials or equipment belonging to Elohim Foundation for financial or material benefit.

- **Abuse of position:** Exploiting a position of trust within the Organization for financial or material benefit. Making decisions that are not fully in the interest Elohim Foundation

- **Conflict of Interest:** Situations where personal interests interfere with organizational duties.

1. Policy Statement

A zero-tolerance policy is Elohim Foundation answer to fraud. Fraud will not be tolerated under any circumstance. Appropriate disciplinary actions may be taken against any employee or external party involved if found of committing fraud. All efforts will be made to recover assets misappropriated or losses suffered due to fraud.

2. Roles and Responsibilities

In general, Management is responsible for the detection and prevention of fraud, misappropriations, and other inappropriate conduct.

5.1. Board of Trustees

- As part of risk management, the BoT should ensure that there is an on-going process designed to identify any fraudulent acts among other risks.

5.2. Director Generals

- The BoT delegates the overall responsibility for managing fraud to both the Directors General of Elohim Foundation
- They are responsible for ensuring that internal control systems function effectively to minimize the financial, operational and reputational risks arising from fraud.
- Design an effective control environment to prevent fraud.

5.3. Senior Management

- Ensure that there are policies, procedures and systems in place which support the implementation of the Fraud Policy.
- Where fraud has taken place, review existing or implement new controls to reduce the risk of similar fraud from re- occurring.

5.4. All employees (our people) should:

- Take responsibility for ensuring that any party or individual that does business with Elohim Foundation strictly adhere to the standards and principles of this policy.
- Perform their duties with honesty, integrity and in an ethical manner.
- If they see or suspect fraudulent activity, they must report that suspected fraudulent activity immediately.
- Notify internal audit/Human Resources Office or supervisors.

5.5. Supervisors and Middle Managers should:

- Ensure that effective operation of preventative and detection controls minimize the opportunity for fraud in their areas of work through regular reviews of control systems for which they are responsible.
- Promote sound fraud risk management practices within all activities for which they are responsible by ensuring that controls are being complied with.
- Cooperate fully with fraud investigations.

5.6. Non-Staff (Consultants/Vendors/Partners, etc)

- Report any suspected fraudulent activity immediately, this requires alert to the possibility of unusual events and / or transactions, etc.
- Expected to conduct themselves with integrity, openness, objectivity, selflessness and honesty.
- In case of any investigations, corporate with internal audit checks/reviews.

3. Reporting

6.1. Mandatory Reporting of Prohibit Conduct

All Elohim Foundation Staff, Consultant, Interns, Vendors, Partners, Secondees and other Stakeholders shall report in good faith fraud allegations, concerns or suspicions or retaliation related to fraud that they have witnessed, or know of, by other Centre's representatives, or by people employed by or working for hosted institutions or the community within which the Centers operate.

6.2. How to Raise a Complaint

6.2.1. Elohim Foundation Staff members, board members, interns, students, consultants shall report their allegations or concerns to the Centers' HRUs or follow the whistleblowing or grievance procedure to report fraud allegations.

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6.2. Elohim Foundation will ensure that reporting and incident management procedures enable an appropriate and swift investigation of any given case.

4. Actions constituting Fraud

7.1. Asset misappropriation

a) Cash
- Theft of cash.
- Abnormal cash payment.
- Theft of funds through electronic banking.
- Processing Invoices that exceed the contract amount without supporting and approved documentation.

b) Non-cash
- Theft of intellectual property.
- Disclosing confidential information to outside parties without authority for personal gain.
- Theft or misappropriation of supplies, inventory, securities or any other assets such as furniture, fixtures or equipment.
- Use of Elohim Foundation assets (including office supplies, letterheads, etc) for personal gain
- False accounting.
- Material and deliberate misstatement of accounting information.
- Unlawfully influencing decision-making: using unlawful means to influence decision making within Elohim Foundation
- Forging documents or signature.

7.2. Insurance
- False claims for workers' compensation.
- False claim for accidents or other claims.

7.3. Fraudulent disbursements
- Falsifying expense claims.
- Corporate credit card misuse.
- Creating fictitious vendors.
- False invoicing.
- Payroll falsification.
- Forgery or alteration of any document.

7.4. Corruption

- Collusive bidding.
- Inside trading.
- Secret commissions (kickbacks received by employees- our people), that is seeking or accepting anything of material value for personal gain from contractors, vendors or persons providing service(s)/goods.
- Conflict of Interest and Illegal Gratuities.

7.5. Fraudulent statements

- Intentional statements of incorrect or misleading employment history / education qualifications.
- Providing false or misleading information or failing to provide information when there is an obligation to do so.
- Inappropriate use of delegated authority results in fraud, misappropriation or obtaining benefit by deception or other unethical measures.
- Manipulation of contracts: using unethical or unlawful means to exercise pressure in the process of engaging staff, vendors or partners, and insurance of contracts and agreements.
- Unfair use of power in order to get jobs or other benefits to family or friends, patronage or favoritism on the basis of family relationships.

7.6. Scientific fraud

- Unethical and dishonest practices in research.
- Manipulation, fabrication, or misrepresentation of data or findings.

5. Investigation Procedure

The investigation process will be as per the Grievance, and Disciplinary Action Procedure (See Annex I)

8.1. Rights and Privileges of the Suspect:

- Any staff member or partner under investigation shall be treated fairly and with dignity, consistent with Elohim Foundation HR policies and international due process standards.
- The subject will be informed of the allegations in a timely manner and given an opportunity to respond.
- No presumption of guilt shall be made until the investigation is concluded and findings validated.

8.2. Recovering Assets

- Elohim Foundation will take necessary measures to recover losses resulting from fraudulent activities.
- This may include financial restitution, withholding of final payments, contract termination, or legal proceedings in host-country jurisdictions.
- Recovered assets will be reported transparently to the DGs, COO, and relevant donors, and reintegrated into program resources.

8.3. Disciplinary Action

- Confirmed cases of fraud or corruption will be addressed under Elohim Foundation Disciplinary and Corrective Action Policy and procedure, which allows sanctions up to dismissal.
- HR will ensure alignment with staff rules, host-country labor laws, and donor contractual obligations.
- For external parties (consultants, vendors, implementing partners), Elohim Foundation reserves the right to terminate agreements, blacklist entities, and notify donors or relevant authorities.

8.4. Follow-Up Action

- Investigation reports will be submitted to the DGs and COO for decision-making and, where appropriate, shared with the Board of Trustees (BoT).
- Lessons learned will be integrated into Elohim Foundation internal controls, staff training, and partner due diligence.
- Reports of confirmed fraud will be communicated to donors, in line with grant agreements and fiduciary obligation.

8.5. Whistleblower Protection

- Elohim Foundation reaffirms its commitment to non-retaliation: Staff, consultants, or partners who report suspected fraud in good faith will be protected from retaliation, discrimination, or adverse action.
- Concerns may be raised through the Whistleblowing and Safeguarding channels, HR focal points, or directly to the DG/COO.
- Allegations of retaliation will be independently investigated and, if substantiated, will lead to disciplinary action.
- Confidentiality will be maintained at all stages, except where disclosure is legally required.

6. Investigation of Allegations

9.1. The internal Audit Unit of Elohim Foundation have the primary responsibility for the investigation of all suspected fraudulent acts and will issue reports to the Directors General and the chair of the Audit committee.

9.2. Any reported suspected fraud will be investigated promptly noting that any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to Elohim Foundation

9.3. Elohim Foundation will take disciplinary action against any staff member or blacklist any vendors, partners, or contractors/stakeholders found to have acted in violation of this policy, including termination, recovery of any financial loss, and reporting to relevant law enforcement agencies.

7. Training

Elohim Foundation will raise awareness through seminars and induction programs of the Anti-Fraud Policy and Guidelines. This guideline will be part of all vendors/consultants, secondees' contracts. Refresher training on anti-fraud will also be conducted regularly.

8. Review

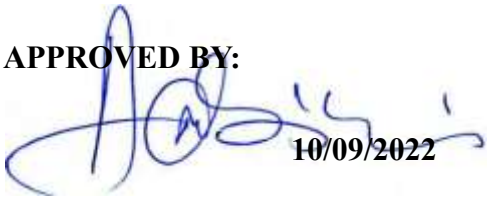
a) This policy will be reviewed every three years or earlier if required by the Human Resources Unit.
b) Any changes made to the Policy will be presented to the Senior Leadership Team for endorsement and thereafter submitted to the Common Board of Trustees for approval.

9. Related Documentation

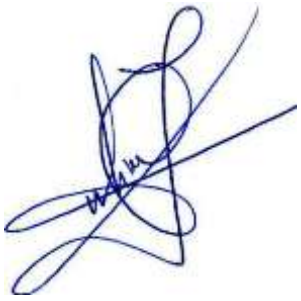
The Anti-Fraud Policy should be read in conjunction with other relevant documents, such as:

- Anonymous Reporting Hotline
- Modern Slavery and Human Trafficking Policy
- Anti-Bribery, Anti-Corruption Practices, Anti-Money Laundering and Anti-Terrorist Financing Policy - -Fraud Policy
- Integrity Policy
- Procedures for Whistleblowing
- Staff Policy Compliance, Conflict of Interest Declaration and Code of Conduct Form - Safeguarding Policy
- Procedures for Whistleblowing
- Procurement Policy
- Environmental and Social Safeguards Policy
- Data protection policy
- -Research Ethics Review policy (under revision)

APPROVED BY:



10/09/2022



10/09/2022

Mrs. Ngozi Obilor
President Board of Trustees.

Dr. Ibecheole, Julius PMD. NES.
Chief Executive Officer/Founder