

BANDAMA CHARITY FOUNDATION SIERRA LEONE

ANTI-FRAUD AND CORRUPTION POLICY

Zero-Tolerance Framework for Fraud, Bribery and Corruption Prevention

BCF-SL | Save Lives | Empowering Communities Through Service

Document Type: Anti-Fraud and Corruption Policy — Binding on All Staff, Trustees and Partners

Legislative Basis: Anti-Corruption Commission Act (Sierra Leone) | BCF-SL Code of Conduct | Financial Management Policy

Applies To: All trustees, board members, staff, volunteers, interns, contractors, partners, donors and suppliers

Policy Status: Zero-Tolerance | non-negotiable

1. PURPOSE

BCF-SL is a charitable organisation funded by the trust of donors and the generosity of supporters. Every unit of resource entrusted to BCF-SL belongs to the communities and beneficiaries it serves. This Anti-Fraud and Corruption Policy exist to protect that trust establishing BCF-SL's zero-tolerance position on fraud, bribery, and corruption; defining the responsibilities of every person associated with BCF-SL; and establishing a clear, safe, and confidential mechanism for reporting and investigating suspected wrongdoing.

2. DEFINITIONS

Term	Definition	Examples
Fraud	Intentional deception intended to secure an unfair or unlawful gain, or to cause loss to another	Falsifying expense claims; submitting fabricated receipts; misappropriating BCF-SL funds or assets; creating ghost employees
Corruption	The abuse of entrusted power for private gain regardless of whether money changes hands	Awarding contracts to connected parties; manipulating procurement; demanding or accepting 'facilitation payments'
Bribery	Offering, giving, receiving, or soliciting anything of value money, gifts, favors, or advantages to improperly influence an official action	Offering a supplier a gift to secure a contract; accepting cash to approve an inflated invoice
Conflict of Interest	A situation where a personal, financial, or professional interest could or could appear to influence a decision made in BCF-SL's name	Participating in a procurement decision involving a family member's business; awarding grants to affiliated organisations
Misappropriation	Taking, misusing, or diverting BCF-SL funds, assets, or property for personal or unauthorized use	Using BCF-SL vehicle for personal travel without authorisation; diverting programme cash to personal accounts

3. POLICY STATEMENT — ZERO TOLERANCE

BCF-SL maintains an absolute zero-tolerance position towards fraud, bribery, corruption, and misappropriation in any form. This is not a policy of proportion or discretion any confirmed case of fraud or corruption will result in disciplinary action up to and including immediate termination and referral to law enforcement authorities, regardless of the seniority of the person involved, the amount, or the circumstances. There are no exceptions.

- All staff; trustees, volunteers, and partners must act with complete integrity and transparency at all times.
- Conflicts of interest must be declared promptly and in full and managed according to BCF-SL's Conflict of Interest Policy.
- Suspected fraud, bribery, or corruption must be reported immediately through the channels defined in this Policy.
- All persons who report a concern in good faith are protected from retaliation under BCF-SL's Whistleblower Protection Policy.

4. RESPONSIBILITIES

Role	Anti-Fraud Responsibilities
CEO / Executive Director	Holds ultimate accountability for BCF-SL's anti-fraud culture; ensures policy is communicated and enforced; authorizes investigations; reports serious cases to Governing Board and, where required, law enforcement
Internal Risk & Audits Director	Conducts quarterly internal audits; reviews financial controls; investigates reported concerns; maintains the Fraud Incident Register; leads all fraud investigations
Finance Director	Maintains financial controls; ensures segregation of duties; reviews all transactions; flags irregular financial activity immediately
HR Director	Ensures all staff sign the Code of Conduct and Anti-Fraud Commitment; leads disciplinary processes following confirmed fraud
All Staff, Trustees and Volunteers	Act with integrity; report any suspected fraud or corruption immediately; cooperate fully with all investigations; never facilitate, conceal, or fail to report suspected wrongdoing

5. REPORTING — HOW TO REPORT A CONCERN

BCF-SL provides multiple reporting channels to ensure that every person can report a concern safely, confidentially, and without fear of retaliation. All concerns are treated seriously, investigated promptly, and handled with strict confidentiality.

Reporting Channels

- Direct report to the Internal Risk & Audits Director (verbally or in writing).
- Email to the CEO / Executive Director for concerns involving senior staff.
- Confidential written report placed in the sealed Fraud Reporting Box at BCF-SL's main office.
- Through a trusted line manager, supervisor, or Governing Board member.
- Through BCF-SL's external auditor if internal channels are compromised.

Whistleblower Protections

- No person who reports a concern in good faith will face any retaliation, adverse employment action, or disadvantage.
- Reporter identity is kept strictly confidential disclosed only where legally required.
- Anonymous reports are accepted and investigated where sufficient information is provided.
- Any act of retaliation against a reporter is itself a serious disciplinary offence.
- BCF-SL's Anti-Retaliation Policy applies from the moment a report is made.

6. INVESTIGATION, CONSEQUENCES AND RECOVERY

1. Receipt and Registration: All reports are formally received by the Internal Risk & Audits Director and registered in the Fraud Incident Register within 24 hours.
2. Preliminary Assessment: The Internal Risk & Audits Director conducts a rapid preliminary assessment within 5 working days to determine whether a formal investigation is warranted.
3. Formal Investigation: A full, independent, documented investigation is conducted. The subject of the investigation is informed and given the right to respond except where prior notification would compromise evidence.
4. Outcome and Disciplinary Action: If fraud, bribery, or corruption is confirmed: immediate disciplinary action (up to termination); referral to the Sierra Leone Police Service and Anti-Corruption Commission; recovery of misappropriated funds through all available legal means.
1. Learning and Prevention: Post-investigation review to identify the control failure that allowed the fraud to occur; controls are strengthened to prevent recurrence; findings are shared (in anonymized form) at the next Governing Board meeting.

Chief Executive Officer

Signature & Date

Internal Risk & Audits Director

Signature & Date