



WY-ICARE INITIATIVE

Anti-Fraud & Anti-Corruption Policy

Women and Youth Initiative for Climate Action and Resilient Environment

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Review Cycle: Every Two (2) Years

Approved by: Board of Trustees

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01. Policy Statement

WY-ICARE Initiative (Women and Youth Initiative for Climate Action and Resilient Environment) is committed to conducting its operations with the highest standards of honesty, integrity, accountability, transparency, and ethical conduct. The organization adopts a **zero-tolerance approach** to fraud, corruption, bribery, embezzlement, theft, financial misconduct, forgery, and all other forms of dishonest behaviour.

Every employee, volunteer, consultant, trustee, intern, partner, contractor, and service provider has a personal and professional responsibility to prevent, detect, and report fraud in all its forms. This policy reflects our binding commitment to ethical governance and serves as a cornerstone of our accountability to donors, partners, beneficiaries, and the communities we serve.

We conduct our affairs in full compliance with the Constitution of the Federal Republic of Nigeria, the Corrupt Practices and Other Related Offences Act (ICPC Act), the Economic and Financial Crimes Commission Act (EFCC Act), the Money Laundering (Prevention and Prohibition) Act, and all applicable donor regulations and international standards.



02. Purpose and Objectives

This policy aims to:

- Protect WY-ICARE's assets, resources, and reputation from all forms of fraud and corruption.
- Promote a culture of accountability, transparency, and ethical behaviour across all levels of the organization.
- Prevent financial losses and ensure the proper use of donor and public funds.
- Strengthen donor confidence and satisfy compliance requirements of institutional funders.
- Ensure full compliance with Nigerian laws and international donor regulations.
- Provide clear guidance on preventing, detecting, reporting, and addressing fraudulent activities.
- Establish robust internal controls that minimize opportunities for fraud.
- Protect individuals who report suspected fraud or corruption in good faith from retaliation or victimization.

03. Scope and Coverage

This policy applies to all individuals and entities associated with WY-ICARE Initiative, including but not limited to:

- Board of Trustees and all governance bodies
- Executive Director and senior management
- All staff members (full-time, part-time, and temporary)
- Volunteers and interns
- Consultants and independent contractors
- Vendors, suppliers, and service providers
- Partner organizations and implementing agencies
- Grant beneficiaries and community representatives acting on behalf of WY-ICARE

This policy governs all WY-ICARE operations, programmes, projects, and activities regardless of location or funding source. All covered persons are expected to understand and comply with this policy as a condition of their engagement with the organization.

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04. Guiding Principles

WY-ICARE shall uphold the following principles in all its operations:

Principle	Description
Integrity	We act with honesty and uphold the highest ethical standards in all dealings.
Accountability	We take responsibility for our actions and decisions and are answerable to stakeholders.
Transparency	We operate openly, with clear documentation and accessible records.
Fairness	We treat all persons equitably and without bias in all processes.
Confidentiality	We protect sensitive information and respect the privacy of reporters and subjects.
Professionalism	We maintain competence and diligence in carrying out our duties.
Zero Tolerance for Fraud	We do not tolerate any form of fraudulent or corrupt conduct under any circumstances.



05. Definitions of Fraud and Corruption

5.1 Definition of Fraud

Fraud refers to any intentional act designed to obtain an unfair or unlawful advantage through deception, misrepresentation, concealment, or abuse of position. For the purposes of this policy, fraud encompasses but is not limited to the following categories:

Financial Fraud

- Theft of cash or misappropriation of funds
- Embezzlement or unauthorized withdrawals
- Falsification of accounting records or financial statements
- Diversion of donor or organizational funds
- Duplicate payments or forged cheques
- Payroll fraud including ghost workers or inflated claims

Procurement Fraud

- Inflated quotations or overpricing of goods and services
- Use of fake or non-existent suppliers
- Bid manipulation, collusion, or rigging of tender processes
- Conflict of interest in procurement decisions
- Splitting of purchases to avoid competitive bidding thresholds

Asset Fraud

- Theft of organizational equipment, vehicles, or property
- Unauthorized personal use of organizational assets
- Disposal of assets without proper approval



- Misuse of WY-ICARE's name, logo, or intellectual property

Document Fraud

- Forgery of signatures, certificates, or official documents
- Creation or use of fake invoices, receipts, or vouchers
- Alteration or destruction of records
- False travel claims or activity reports

Corruption and Bribery

- Offering, giving, receiving, or soliciting bribes of any kind
- Facilitation payments to public or private officials
- Kickbacks, commissions, or secret profits
- Extortion or coercion for personal or organizational gain
- Abuse of office or position for private benefit

Other Fraudulent Acts

- Money laundering and terrorist financing
- Identity theft and impersonation
- Cyber fraud including phishing and unauthorized system access
- Misuse of beneficiary data or confidential information
- Collusion with external parties to defraud the organization

5.2 Prohibited Conduct

The following conduct is strictly prohibited under this policy and may result in immediate disciplinary action:

- Any form of bribery, corruption, or facilitation payment, regardless of amount or local custom.
- Embezzlement, theft, or unauthorized use of organizational funds or assets.
- Falsification or deliberate omission in financial or operational records.



- Engaging in procurement processes where a conflict of interest exists without disclosure.
- Any attempt to improperly influence decisions through gifts, hospitality, or other advantages.
- Retaliation against any individual who reports suspected fraud in good faith.
- Failure to report known or suspected fraudulent activity.

5.3 Gifts and Hospitality

WY-ICARE recognizes that modest business courtesies may be a normal part of professional relationships. However, all gifts and hospitality must meet the following conditions:

- All gifts given or received with a value exceeding **₱5,000** must be recorded in the Gifts and Hospitality Register and reported to a line manager.
- Gifts of cash, cash equivalents (gift cards, vouchers), or personal cheques may not be given or accepted under any circumstances.
- No gifts or hospitality may be offered to or accepted from any public official, donor representative, or any person involved in a procurement or funding decision.
- Gifts must never be offered or accepted with the expectation or intent of influencing a business decision, securing a contract, or obtaining preferential treatment.
- Excessive, frequent, or luxurious hospitality is prohibited regardless of value.
- All gifts and hospitality must be reasonable, proportionate, and justifiable in the context of WY-ICARE's mission and values.

06. Procedural Guidelines

6.1 Conflict of Interest

A conflict of interest arises when an individual's personal, financial, or family interests could influence, or appear to influence, their professional judgment or actions on behalf of WY-ICARE. All personnel must:

- Disclose any actual, potential, or perceived conflict of interest to their supervisor or the Executive Director in writing.
- Recuse themselves from any decision-making process where a conflict exists.
- Refrain from engaging in activities that compete with or detract from WY-ICARE's interests.
- Disclose any personal or financial interest in entities seeking to do business with WY-ICARE.

Failure to disclose a conflict of interest shall be treated as a serious breach of this policy and may result in disciplinary action.

6.2 Internal Controls

WY-ICARE shall maintain effective internal controls to prevent and detect fraud, including:

- **Segregation of duties** — No single individual shall have control over all aspects of any financial transaction.
- **Dual authorization** — All payments above defined thresholds require at least two authorized signatories.
- **Bank reconciliations** — Monthly reconciliation of all bank accounts by personnel independent of receipt and disbursement functions.
- **Budget monitoring** — Regular comparison of actual expenditure against approved budgets with variance analysis.

- **Asset register** — Maintaining a complete and up-to-date register of all organizational assets with periodic physical verification.
- **Inventory management** — Proper controls over the receipt, storage, and issuance of programme supplies and materials.
- **Access control** — Password protection, user access limits, and audit trails for all financial and information systems.
- **Procurement controls** — Competitive bidding, vendor due diligence, and documented procurement decisions.
- **Financial approvals** — Clearly defined authorization limits and escalation procedures.

6.3 Procurement Integrity

All procurement activities must follow WY-ICARE's documented procurement procedures. The following standards apply:

- Competitive tendering processes must be maintained for all contracts above defined thresholds.
- Vendor selection must be based on objective criteria including price, quality, delivery capacity, and integrity record.
- Any actual or perceived conflict of interest in a procurement process must be declared, and the conflicted individual must recuse themselves from the decision.
- Procurement files must be complete, accurately documented, and available for audit.
- Splitting of orders to circumvent approval thresholds is strictly prohibited.

6.4 Record Keeping

Accurate and complete records must be maintained for all transactions, decisions, and programme activities. The following requirements apply:

- All financial records must be complete, accurate, and supported by valid documentation.
- No off-the-books accounts, false entries, or deliberately misleading documentation will be tolerated.
- Records relating to fraud investigations shall be securely maintained and treated as strictly confidential.



- Records must be retained in accordance with WY-ICARE's record retention policy and applicable legal requirements.
- Electronic records must be backed up regularly and protected against unauthorized access or tampering.



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07. Roles and Responsibilities

Role	Responsibilities
Board of Trustees	Policy oversight and governance; monitoring compliance; approving investigation terms of reference; receiving and acting on investigation reports; ensuring adequate resources for fraud prevention.
Executive Director	Implementing the policy; providing leadership on ethical conduct; ensuring prompt and thorough investigation of all allegations; reporting major fraud cases to the Board; enforcing disciplinary measures.
Finance Unit	Designing and maintaining internal controls; financial monitoring and reporting; monthly bank reconciliations; conducting fraud risk assessments; flagging unusual transactions.
Procurement Committee	Ensuring transparent procurement processes; conducting vendor due diligence; overseeing competitive bidding; documenting procurement decisions; identifying procurement-related fraud risks.
Programme Staff	Implementing programme activities with integrity; safeguarding programme assets; reporting suspected fraud; cooperating with investigations; maintaining accurate activity records.
All Employees	Acting honestly and ethically at all times; protecting organizational assets; promptly reporting suspected fraud or corruption; cooperating fully during investigations; completing mandatory anti-fraud training.



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08. Fraud Reporting and Whistleblower Protection

8.1 Reporting Channels

Anyone who suspects or becomes aware of fraudulent activity should report it immediately through one of the following channels:

- **Executive Director** — Direct report for all fraud allegations
- **Finance Manager** — For financial irregularities and suspected financial misconduct
- **Board Chairperson** — For allegations involving senior management or when other channels are inappropriate
- **Confidential Whistleblowing Channel** — Anonymous reporting via designated email, phone line, or drop box

Reports should include, where possible: the nature of the allegation, names of persons involved, dates and locations, description of the incident, evidence available, estimated financial impact, and names of witnesses. Reports may be made **anonymously** where the reporter fears retaliation.

8.2 Whistleblower Protection

WY-ICARE guarantees protection against retaliation for any individual who reports suspected fraud or corruption in good faith. No individual shall suffer any adverse consequence as a result of making a good faith report, including:

- Harassment, intimidation, or victimization
- Demotion or denial of promotion
- Dismissal or termination of engagement
- Discrimination in any form



- Reduction in responsibilities or benefits

Any act of retaliation against a whistleblower shall be treated as a serious violation of this policy and will result in disciplinary action against the perpetrator. WY-ICARE will take all reasonable steps to protect the identity of reporters, including anonymous reporters, throughout the investigation process.

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09. Investigation Procedures

Every allegation of fraud or corruption shall be handled in accordance with the following procedures to ensure fairness, confidentiality, and due process:

Step	Stage	Description
1	Logging	All reports received are formally logged in the Fraud Incident Register with a unique reference number and date of receipt.
2	Acknowledgement	The reporter (if identifiable) is acknowledged within 48 hours, confirming receipt and outlining next steps.
3	Assessment	The allegation is assessed for credibility, severity, and urgency to determine the appropriate response.
4	Investigation	Formal investigation is conducted confidentially by designated personnel or external investigators, gathering evidence and interviewing relevant parties.
5	Documentation	All investigation activities, findings, and evidence are documented systematically and securely stored.
6	Reporting	A formal investigation report is submitted to the Executive Director and, where appropriate, the Board of Trustees.
7	Closure	The case is closed with documented recommendations for disciplinary action, system improvements, or other remedial measures.

Investigations shall be fair, impartial, evidence-based, and completed within a reasonable timeframe. The subject of an investigation shall be informed of allegations against them



(where confidentiality permits) and given an opportunity to respond. All parties involved are required to maintain strict confidentiality throughout the process.

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10. Disciplinary Measures

Where fraud or corruption is established following a fair investigation, the following disciplinary actions may be imposed, depending on the severity of the offence:

Measure	Applicable Circumstances
Verbal Warning	Minor breaches of policy without financial loss or malicious intent.
Written Warning	More serious breaches or repeated minor breaches.
Suspension	Pending investigation of serious allegations or as a disciplinary measure.
Summary Dismissal	Confirmed fraud, bribery, embezzlement, theft, or falsification of records.
Recovery of Funds	Restitution of losses through salary deduction, civil litigation, or other lawful means.
Termination of Contract	For consultants, vendors, or partners found to have engaged in fraudulent conduct.
Referral to Law Enforcement	All criminal offences shall be reported to the EFCC, ICPC, or Nigeria Police.
Civil Litigation	Pursuit of civil remedies to recover losses and damages.

The decision on the appropriate disciplinary measure shall consider the nature and severity of the offence, the amount involved, the level of intent, the individual's disciplinary history, and any mitigating or aggravating circumstances. Where a breach constitutes a



criminal offence, the matter shall be referred to the appropriate Nigerian law enforcement authorities regardless of internal disciplinary outcomes.



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11. Fraud Risk Assessment

Annual fraud risk assessments shall be conducted to evaluate vulnerabilities across all WY-ICARE operations. The assessment shall cover the following risk areas:



Risk Area	Risk Level	Key Controls Required	Review Frequency
Cash Management	High	Dual custody, daily reconciliation, secure storage	Monthly
Procurement	High	Competitive bidding, vendor due diligence, segregation of duties	Per transaction
Payroll	Medium	Verification, authorization, direct bank transfers	Monthly
Grants and Programme Funds	High	Budget activity monitoring, verification, beneficiary validation	Quarterly
Asset Management	Medium	Asset register, physical verification, access control	Semi-annually
IT Systems	Medium	Password policies, access logs, data backup, cybersecurity	Quarterly
Inventory	Medium	Stock records, physical counts, issuance controls	Monthly
Travel and Expense Claims	Medium	Pre-approval, documentation requirements, spot checks	Per claim



Risk assessment findings shall be documented and presented to the Executive Director and Board of Trustees with recommended actions to strengthen controls in identified vulnerable areas.



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12. Training and Awareness

WY-ICARE is committed to building a culture of integrity through regular training and awareness programmes. All personnel shall receive training on:

- Ethics and professional conduct in the non-profit sector
- Understanding fraud, corruption, and bribery risks
- Recognizing warning signs and red flags of fraudulent activity
- Financial accountability and internal controls
- Procurement integrity and competitive processes
- Conflict of interest identification and disclosure
- Whistleblowing procedures and protections
- Roles and responsibilities under this policy

Training shall be provided during staff orientation for new employees and reinforced through refresher sessions at least annually. Specialized training shall be provided to personnel in finance, procurement, and management roles. Records of all training activities shall be maintained.



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13. Information Security and Non-Disclosure

All records, reports, complaints, investigations, and documentation generated under this policy are classified as **Restricted Information**. Access is limited strictly to authorized personnel directly involved in the administration, investigation, or enforcement of this policy.

Unauthorized access, sharing, or disclosure of any such records by any party constitutes a serious breach of WY-ICARE's Data Protection Policy and may result in disciplinary action, up to and including dismissal, and potential civil or criminal liability.

Investigation subjects shall be provided with information necessary to respond to allegations against them, but all other investigation details shall remain confidential to protect the integrity of the process and the rights of all parties involved.



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14. Monitoring and Review

Compliance with this policy shall be monitored through the following mechanisms:

- **Internal audits** — Regular audits of financial systems, procurement processes, and programme implementation
- **External audits** — Annual independent audit by a qualified external auditor
- **Spot checks** — Unannounced verification of assets, records, and activities
- **Management reviews** — Periodic review of fraud risk indicators and control effectiveness
- **Donor compliance reviews** — Cooperation with donor-mandated monitoring and evaluation activities

Monitoring findings shall be reported to the Executive Director and Board of Trustees, and corrective actions shall be implemented promptly to address identified weaknesses.

15. Policy Violations

Violation of this policy may result in one or more of the following consequences:

- Disciplinary action in accordance with WY-ICARE's Disciplinary Policy
- Termination of employment, contract, or partnership agreement
- Recovery of financial losses sustained by the organization
- Criminal prosecution and referral to relevant law enforcement authorities
- Civil litigation to recover damages
- Reporting to donor agencies and suspension of funding
- Blacklisting from future engagement with WY-ICARE

WY-ICARE takes all violations of this policy seriously. The severity of the consequence shall be proportionate to the nature and extent of the violation. Ignorance of this policy shall not be accepted as a defence for non-compliance.



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16. Compliance with Laws

This policy shall be implemented in accordance with the following legal and regulatory frameworks:

- Constitution of the Federal Republic of Nigeria
- Corrupt Practices and Other Related Offences Act (ICPC Act)
- Economic and Financial Crimes Commission Act (EFCC Act)
- Money Laundering (Prevention and Prohibition) Act
- Companies and Allied Matters Act (where applicable)
- Relevant Nigerian anti-corruption legislation and regulations
- Applicable donor regulations and compliance requirements
- WY-ICARE Financial Policies and Procedures Manual
- WY-ICARE Procurement Policy
- WY-ICARE Code of Conduct
- WY-ICARE Child Protection Policy

Where there is a conflict between this policy and applicable law, the requirements of the law shall prevail. All personnel are expected to comply with both the letter and spirit of all applicable laws and regulations.



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17. Review and Evaluation

This policy shall be reviewed every two (2) years by the designated policy owner in collaboration with the Executive Director, Finance Manager, and relevant senior management. The Compliance function shall conduct an annual review of the fraud incident register, investigation outcomes, risk assessment results, and any reported incidents.

Reviews may also be triggered earlier by:

- Material changes to applicable Nigerian legislation or donor requirements
- Significant organizational expansion, restructuring, or change in operations
- Findings from internal or external audits
- Documented policy breaches or fraud incidents
- Changes in international best practices or sector standards

All amendments shall be formally documented, approved through the approval chain, and communicated to all relevant stakeholders. Findings from each review shall be presented to the Board of Trustees.

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18. Approval Chain

This policy is issued under the authority of WY-ICARE Initiative and is effective upon signature by the Approver.

Role	Name	Title	Signature	Date
Author		Head, Administration & HR		
Reviewer		Head of Programmes		
Approver		Executive Director / Board Chair		

Effective Date: 7 July 2026

Next Review Date: 7 July 2028

Policy Owner: Executive Director, WY-ICARE Initiative

WY-ICARE Initiative

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Annexes

Annex 1: Fraud Reporting Form

Field	Details
Date of Report	
Name of Reporter (Optional)	
Department / Unit	
Contact Information (Optional)	
Nature of Allegation	
Date(s) of Incident	
Person(s) Involved	
Description of Incident	
Evidence Available	
Estimated Financial Impact (if known)	
Witnesses (if any)	
Signature (if applicable)	

Annex 2: Fraud Risk Areas Checklist

Risk Area	Risk Level	Control in Place	Action Required
Cash Management	High	Yes / No / Partial	
Procurement	High	Yes / No / Partial	
Payroll	Medium	Yes / No / Partial	
Grants Management	High	Yes / No / Partial	
Asset Management	Medium	Yes / No / Partial	
IT Systems	Medium	Yes / No / Partial	
Inventory	Medium	Yes / No / Partial	
Travel Claims	Medium	Yes / No / Partial	
Programme Implementation	High	Yes / No / Partial	
Beneficiary Management	Medium	Yes / No / Partial	

This policy is aligned with international governance and accountability practices commonly expected by institutional donors and partners, making it suitable for use by WY-ICARE in engagements with governments, development agencies, and international funding organizations.