

STOPPING FRAUD & CORRUPTION IN THE WORKPLACE

A Guide to Understanding Mercy Corps' Anti-Corruption Policy

This document provides additional guidance around Mercy Corps' policy concerning fraud and corruption in the workplace. This guide is not a replacement for the stated policy but instead highlights key issues that team members may encounter in their roles and steps to seeking assistance.

Mercy Corps is committed to a work environment in which everyone acts with the highest level of ethical conduct. Our organization will not tolerate fraudulent or corrupt actions by its team members.



View the Anti-Corruption policy in the Digital Library.



View the eLearning course in Talent Development at Talent.MercyCorps.org



Everyone has the right and obligation, per Mercy Corps' policy, to tell someone about possible fraud or corruption. If you hear about or are aware of such actions, you should **report** this to your **supervisor**, a **trusted leader** or the **Integrity Hotline**. You may choose to remain anonymous with the Integrity Hotline.



Remember if you see or hear about fraudulent activities, help address the problem by reporting so that everyone can have an ethical working environment and ensure that resources go to those we are there to help. As a reporter, witness and/or victim, **your role is not to investigate**; that will be done through an established confidential process.



Power dynamics, gender roles, historic inequalities, and cultural norms can contribute to fraudulent activities. Regardless of cultural practices and social norms, **Mercy Corps will not tolerate fraud or corruption as defined in the policy.**



There are various reasons why someone might be hesitant to speak out or seek assistance if they see or hear about fraudulent or corrupt behavior. These reasons might include fear of retaliation, of not being believed, or not being taken seriously. **Know that Mercy Corps will take all allegations seriously. Retaliation will not be tolerated for reports made in good faith, even if not substantiated.**



It is important for everyone to respect the seriousness of these types of allegations. If a team member tells you about a suspected fraudulent or corrupt action, **LISTEN** and **ASSIST** them with reporting.

THE FOLLOWING KEY TERMS ARE IMPORTANT TO UNDERSTAND:



Corruption includes any act of fraud, theft, embezzlement, or bribery.

Fraud is knowingly deceiving another to gain an unfair benefit.

Theft is the unauthorized taking of any form of property or money.

Embezzlement is the taking of any form of property or funds by a person entrusted with the care of the property or funds.

Bribery is money or favor given/received or promised in order to influence the judgment or conduct of another person.

Kickbacks are illegal payments made to someone who has improperly assisted with an appointment or event.

REMEMBER!

Mercycorps.org/integrityhotline
or
integrityhotline@mercycorps.org



Policy Talk

QUESTIONS

Do I have to give my name when making a report about possible fraud or corruption?

If I tell my manager about a suspected case of fraud but she doesn't report it to the Ethics Team, what can I do?

What happens once I report an allegation or suspicion of corruption?

One of my colleagues puts lodging expenses on his travel expense report even though he stays with relatives and not in a hotel. Is this fraud?

My aunt and her family are very poor; my uncle died 2 years ago and my aunt cannot work. Since our food distribution program is meant to help those in need can I put my aunt's name on the list? Is it okay if she shares those benefits with me as a way to say thank you?

In my culture, it is expected that one will help his family members. My brother has a shop that sells items which Mercy Corps will need for its projects. Why can't I tell my brother in advance that we will be buying these things and how much we have to spend?

...AND ANSWERS

Mercy Corps accepts **anonymous reports** through the **Integrity Hotline**.

All managers are required to report suspicions to the Ethics Team. **By reporting to your manager, you have met your responsibility;** however you may also report your concerns to the Integrity Hotline or Ethics Team directly.

Mercy Corps takes all reports seriously and will act upon the report. The allegation will be investigated through a process that is thorough and objective. Serious allegations of fraudulent or corrupt behavior may result in the subject of the allegations being suspended while the investigation is conducted.

Yes, this would be considered fraud. Charging Mercy Corps as though he paid for lodging services would be considered a false claim, a type of fraud under this policy.

Adding your aunt's name would be considered fraud and receiving a share of the proceeds would be considered a kickback. All country programs have pre-determined eligibility criteria and only individuals who have been properly screened by those responsible should have their names included. **Team members should NEVER receive a payment from a recipient.**

It is only natural to want to assist a family member. However, Mercy Corps conducts business under the policy of fairness and transparency. **Sharing confidential Mercy Corps information in an attempt to help someone gain an unfair advantage is fraud.** Taking these actions would likely result in your employment with Mercy Corps ending and your brother losing the ability to ever do business with Mercy Corps.

