DNDi

Best Science
for the Most Neglected

Fraud & Corruption Prevention Policy

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Objective

DNDi has always been committed to the highest possible standards of openness, transparency, honesty and accountability, and is determined to maintain a culture of transparency and an opposition to fraud and corruption.

Based on this commitment, this Fraud & Corruption Prevention Policy (FCP Policy) outlines the principles to which DNDi is committed in relation to preventing, reporting and managing fraud, bribery, and corruption. This policy reinforces our core values, by setting out the ways in which employees or members of the public can voice their concerns about suspected fraud or corruption.

This policy shall be considered in relation to other pillars guiding our conduct at DNDi, in particular:

- DNDi Code of Conduct
- DNDi Global Staff Policy
- DNDi Procurement Policy
- DNDi Conflict of Interest Policy
- DNDi Policy on Research Misconduct
- Safeguarding Dispute Resolution Process

DNDi upholds a policy of zero tolerance toward fraud, bribery, and corruption, irrespective of the amount involved or the context in which it occurs. The organization is committed to the highest standards of ethical conduct, transparency, and accountability in all its operations. Any act of fraud, bribery, corruption, or related misconduct, whether perpetrated by DNDi Members, implementing partners, or other third parties, will be addressed through appropriate disciplinary, contractual, and/or legal measures.

Scope

This policy applies to all DNDi Members, Members of a DNDi Body, & Other Representatives of DNDi.

DNDi's Fraud and Corruption Prevention Policy applies globally across all entities and regions. Where it is not feasible to integrate all regional legal or regulatory requirements into this global policy, DNDi will either include a provision confirming that applicable regional laws take precedence, or, as an exception, develop a region-specific policy document

Definitions

DNDi Members refers collectively to **DNDi Staff**, meaning all persons engaged by DNDi under an employment contract as defined in the Global Staff Policy, regardless of their place of work; **Members of a DNDi Body**, meaning all individuals serving on DNDi's governing or advisory bodies, including but not limited to the Board of Directors, the Scientific Advisory Committee, the Audit Committee, and any other formally established governance or advisory structure; and **Other Representatives of DNDi**, meaning any individual expressly authorized to act on behalf of DNDi in an official capacity (e.g., secondees, volunteers, or interns), as determined by the Executive Team.

Fraud: For purposes of this Policy, fraud is defined as the use of deception by an individual with the intention of obtaining an advantage for themself or for a third party, by avoiding an obligation, or causing loss to another party. The term fraud is used to describe offences such as, but not limited to, deception, extortion, theft, misappropriation, false representation, as well as concealment of material facts. This Policy is intended to apply to both internal and external fraud. **Internal fraud** is committed directly against DNDi by a DNDi Member. An **external fraud** is committed against DNDi by an external party, for example the employees of a partner or supplier or criminals.

Examples of fraud or fraudulent behavior include:

- Misappropriation of assets, embezzlement, and theft
- Payroll schemes, ghost employees, falsified wages
- Expense reimbursement schemes, mischaracterized expenses, overstated expenses, fictitious expenses, multiple reimbursements
- Billing schemes, personal purchases

Bribery & Corruption: For purposes of this Policy, bribery concerns the practice of offering something of value, usually money, to gain an illicit advantage. Corruption is an abuse of a position of trust to gain an undue advantage.

Some examples of bribery and corruption behaviors include:

- Payment or receipt of bribes
- Kickbacks or other inappropriate payments
- Participation in sham or fraudulent transactions, billing schemes, shell company

The examples provided above are not exhaustive. If there is doubt whether an action, event, or circumstance constitutes fraud, bribery, or corruption, please contact a member of the Fraud & Corruption Prevention (FCP) Committee for guidance and advice.

Policy

A. Prevention

DNDi Members are expected to conduct themselves with integrity and demonstrate awareness of the importance of ethical practices in their day-to-day work. DNDi will not tolerate any level of fraud, bribery, or corruption. Every DNDi Member has a responsibility and obligation to contribute to the management of fraud, bribery, and corruption risks. DNDi is committed to ensuring that opportunities for fraud are reduced to the lowest possible level of risk, effective internal controls are maintained to prevent fraud, and systems and procedures are reviewed and improved following detected cases of fraud. The DNDi prevention mechanism is articulated around four principles:

- A Culture of Honesty and Ethics
- Risk Management and Internal Control Capabilities
- Awareness Raising and Training
- A clear Oversight Process

Third Parties

DNDi systematically engages its contractors, consultants, and other third parties to adhere to best practices in fraud and corruption prevention. This engagement is formalized through measures including, but not limited to:

- Operational due diligence to assess whether third parties have implemented adequate systems to prevent, detect, and manage fraud and corruption risks
- Inclusion of compliance clauses in contractual agreements, requiring the implementation of anti-fraud and anti-corruption mechanisms and granting DNDi rights to act in cases of breach, in line with DNDi's agreement templates.

B. Reporting

DNDi Members individually declare their understanding of the terms of the policy (declaration in Appendix II) during the onboarding process.

DNDi Members must report any reasonably suspected fraud and present any available supporting evidence to relevant reporting person. See prescribed reporting methods below.

If the member's direct line manager (or other designated reporting focal point) is suspected of involvement in fraud, that person shall be excluded from the reporting and investigation process. In such cases, reporting shall be escalated to the next level of supervision, up to the Chair of the Board (and, for the latter, to the Chair of the Audit Committee). In cases of obstruction or undue delay in addressing a report, staff may escalate the matter directly to another member of the FCP Committee.

Where the allegation concerns the Chair of the Global Board and/or the Chair of the Audit Committee, reporting may be made directly to the Secretary of the Board or to any non-conflicted member of the Global Board.

Anyone reporting a potential fraud must act in good faith and have reasonable grounds for believing that the information disclosed constitutes a potential fraud.

For DNDi Staff
Reporting shall be made:

- Through the dedicated reporting mailbox (ethics@dndi.org)
- Through the DNDi Integrity Line (DNDi Integrity Line | DNDi), an online whistleblowing platform that can be used for the anonymous reporting of misconduct in connection with DNDi projects.
- To the relevant line manager or member of the Executive team

For significant matters, such as those involving amounts exceeding €5,000, potential litigation or criminal prosecution, risk of reputational harm, as well as cases directly involving DNDi Leadership, the Strategy & Operations Director must consult the Executive Director, unless the Executive Director is the subject of the allegation, in which case the matter shall be escalated in accordance with Section C.

For Members of a DNDi Body, Executive Director & Friends
The Chair of the Global Board and the Chair of the Audit Committee shall be consulted regarding all cases involving a Member of a DNDi Body and the Executive Director, subject to the recusal and substitution provisions set out in Section C.

The Chair of the Global Board and/or the Chair of the Audit Committee should consult with the Executive Director, unless the Executive Director is the subject of the allegation, and may request an investigation or advice from the FCP Committee.

C. Case Characterization

Fraud and Corruption Prevention Committee
As a matter of principle, at least two persons need to decide how to handle the case. It is proposed to set up an FCP Committee with the relevant persons. Once an alleged fraud is reported, the FCP Committee will determine whether the report has sufficient substance to

undertake an investigation and whether the case can be dealt with internally or if external involvement is necessary.

For DNDi Staff, the Strategy & Operations Director sets up the FCP Committee to deal with specific cases, which is composed of some or all of the following persons:

- Permanent members: the Strategy & Operations Director, the Finance & Planning Director, the Director of Legal Affairs, & the Senior Risk, Compliance, & Internal Control Manager
- Optional members may include:
    - The line manager
    - The Executive Director, for any significant situation (as described above)
    - The Director of HR & Organization
    - The Director of External Relations
    - Any other relevant person deemed necessary to ensure independence and effectiveness of the committee.

For Members of a DNDi Body or Executive Director, an FCP Committee will be established and include:

- Permanent members: The Chair of the Global Board, the Chair of the Audit Committee and the Executive Director
- The Chair of the DNDi Body (e.g. SAC) if one of its members is involved
- Support from the Strategy & Operations Director, the Finance & Planning Director, the Director of Legal Affairs, the Senior Risk, Compliance, and Internal Control Manager, or any relevant person deemed necessary to ensure independence and effectiveness of the committee.
- The Executive Director shall not participate in the FCP Committee where they are the subject of the allegation.
- Permanent membership of the FCP Committee at governance level is subject to the recusal and substitution provisions set out below. No individual shall participate in the FCP Committee where they are the subject of the allegation.

Governance-Level Recusal, Substitution and Oversight Arrangements
Any individual who is the subject of an allegation under this Policy, or who has a material conflict of interest in relation to the allegation, shall be immediately excluded from all stages of reporting, case characterization, investigation, decision-making, and communication relating to the case.

Where the Chair of the Audit Committee is the subject of an allegation, the Chair of the Global Board shall appoint another non-conflicted member of the Audit Committee to assume the responsibilities assigned to the Chair of the Audit Committee under this Policy.

Where the Chair of the Global Board is the subject of an allegation, the Secretary of the Board shall assume the responsibilities assigned to the Chair of the Global Board under this Policy. If the Secretary is conflicted or unavailable, the remaining non-conflicted members of the Global Board shall designate from among themselves a member to assume those responsibilities.

Where both the Chair of the Global Board and the Chair of the Audit Committee are the subject of allegations, the remaining non-conflicted members of the Global Board shall assume responsibility for oversight under this Policy and shall designate at least two independent Board members to oversee the handling of the case.

In all such cases, decisions shall be taken exclusively by non-conflicted members.

In cases involving members of the Global Board, the Global Board shall assess whether an independent external review is needed, considering the need to ensure impartiality and credibility.

For cases involving members of the Global Board, decisions shall be validly taken by a majority of the non-conflicted members of the Global Board.

D. Case Investigation

Investigations will be conducted under the leadership of the FCP Committee. Investigations will be carried out in complete independence, objectivity, and confidentiality. The name of the person that reported the suspected fraud, if known, will be kept confidential. The suspected perpetrator of fraud will be given the opportunity to be heard.

The Senior Risk, Compliance, & Internal Control Manager will maintain complete records of all actions related to the investigation to support any potential criminal, civil, or disciplinary proceedings. These records shall be stored in DNDi's secure document management system (e.g. SharePoint) with restricted access rights. Access shall be limited to authorized individuals, ensuring both confidentiality and continuity, and records shall remain available for future reference as required.

The Chair of the Global Board will be informed of any significant issues, unless the Chair is the subject of the allegation, in which case the Secretary of the Board or the designated non-conflicted Board member shall be informed in accordance with Section C.

The Audit Committee will be provided, annually, with a synthesis of cases and investigations that have occurred.

E. Case Management

If an investigation confirms that an act of fraud, corruption or bribery was committed, DNDi will take immediate steps to mitigate potential loss of DNDi's reputation and credibility with donors and partners who are involved in funding or delivering work in question.

It is the responsibility of the relevant Director managing the relationship with partner, donor and/or external auditor (e.g., R&D, External Relations, Finance & Planning, etc.) to propose appropriate next steps regarding the disclosure of fraud to them. This should be done in consultation with the Executive Director, who is responsible for validating the proposed approach. Disclosures must be made in a timely manner and with due care to ensure transparency and accountability, while safeguarding personal data, including not disclosing the name of the perpetrator.

If DNDi has suffered pecuniary loss or loss of other material assets, efforts will be made to seek restitution from the individual(s) responsible for the fraud, corruption or bribery.

In case of substantiated fraud, corruption or bribery, DNDi will pursue disciplinary, legal action, and criminal prosecution as appropriate.

Following a case of fraud, corruption or bribery, the Strategy & Operations Director will ensure that all DNDi Staff in the affected area are debriefed on the process and outcome of the investigation. The party who reported the initial suspicion of fraud, corruption or bribery will also be informed to provide assurance that their claims have been taken seriously.

A thorough review of operating procedures in the areas affected by the fraud, corruption or bribery will be performed by the impacted Department and a lessons learned exercise will be conducted.

It is DNDi's policy to protect all DNDi Staff from reprisal, retaliation or other adverse action when reporting alleged acts of fraud, corruption or bribery if such reporting is done in good faith and with reasonable grounds for suspicion. Conversely, DNDi will protect the position and reputation of the persons falsely suspected of fraud, corruption or bribery.

See Appendix I for an overall FPC process chart.

Roles and responsibilities

The Global Board approves this Policy and exercises oversight of its implementation. The Board is informed of any significant cases of fraud, corruption, or bribery.

In cases concerning members of a DNDi Body or the Executive Director, the Chair of the Global Board and the Chair of the Audit Committee are permanent members of the FCP Committee, subject to the recusal and substitution provisions set out in Section C.

The Executive Director

- Sets the vision and the overall tone to reinforce the message that fraud, bribery and corruption is not tolerated in DNDi and provides strong support to the Strategy & Operations Director in the implementation of the Policy.
- Reports any significant event related to this Policy to the Chair of the Global Board and the Chair of the Audit Committee as appropriate.
- Consults with the Executive Team, who sets the levels of significance of fraud, corruption and bribery, and implements the policy for Members of a DNDi Body.

The Strategy & Operations Director

- Responsible for implementing the Policy.
- Coordinates risk management at DNDi and ensures mechanisms are in place to investigate suspected fraud, corruption, or bribery.
- Receives reports of suspected fraud, corruption, or bribery from DNDi staff or third parties and provides guidance to the FCP Committee on scope, escalation, and engagement of external experts or legal authorities.
- Ensures that investigations are initiated promptly and appropriately resourced, in coordination with the Senior Risk, Compliance & Internal Control Manager.
- Consults with the Executive Director and/or the line manager of the suspected perpetrator to assess facts, risks, and potential responses.
- Takes appropriate measures in cases of frivolous or bad-faith allegations.
- Ensures awareness-raising activities on fraud, corruption, and bribery are carried out, together with Directors within the Operations department.

The Finance & Planning Director

- Designs and oversees financial controls, including payments, sub-grants, and approvals, and ensures segregation of duties in all finance processes.
- Champions financial integrity by promoting strong internal controls, transparency, and accountability.
- Monitors financial indicators and potential red flags, reviews inconsistencies in transactions, and conducts risk-based financial reviews for early detection of irregularities.
- Provides training to finance staff and budget holders on financial integrity, fraud prevention, and recognition of warning signs.
- Collaborates with the Senior Risk, Compliance, & Internal Control Manager on risk assessments, audits, and continuous improvement of financial controls.
- Escalates suspicions of fraud, corruption, or bribery in line with DNDi procedures.
- Participates in fraud response and case management without leading the investigation process.

The Director of Legal Affairs

- Provides guidance to the FCP Committee on the course of action to be taken, the involvement of external experts or legal authorities, and the conduct of investigations.
- Communicates with and manages external criminal lawyers engaged in the particular jurisdictions in which cases of fraud arise.

The Director of HR & Organization

- Maintains HR records related to disciplinary measures and other employment actions arising from cases of fraud, corruption, or bribery.
- Consults with the Strategy & Operations Director on appropriate disciplinary measures for perpetrators, supervisors whose failures contributed to misconduct, or individuals making frivolous or bad-faith allegations.
- Ensures enhanced reference checks are carried out during recruitment for positions particularly vulnerable to fraud risks (e.g. financial management, procurement).
- Ensures, with the support of HR colleagues, that staff are made aware of this Policy during onboarding, that appropriate training is provided where necessary, and that individual declarations are filed in HR records.

The IST Director

- Ensure appropriate training and cybersecurity measures are implemented.
- Manages reports of electronic fraud or phishing attempts and, when recommended by the FCP Committee, escalates targeted cases to the National Cyber Security Center.
- Ensures the IST Service Desk and IST team act as the first point of contact for suspected cyber fraud.

The Senior Risk, Compliance, & Internal Control Manager

- Responsible for conducting DNDi’s internal investigations into suspected cases of fraud, corruption, or bribery, including gathering evidence, conducting interviews, and preparing investigation reports.
- Defines and oversees DNDi’s fraud and corruption prevention policy and ensures its alignment with organizational risk management frameworks.
- Oversees the adequacy and effectiveness of DNDi’s operational control frameworks to promote deterrence and prevention of fraud, corruption, and bribery.

- Reports periodically on the effectiveness of internal controls to the Strategy & Operations Director, the Finance & Planning Director, and the Audit Committee.
- Maintains secure records of all allegations, investigative actions, and outcomes, ensuring availability for future reference.
- Proposes and follows up on changes to internal controls following confirmed or suspected cases, to strengthen organizational safeguards.
- Works in close collaboration with the Strategy & Operations Director and the Finance & Planning Director to align risk, compliance, and financial oversight measures.

All Line Managers

- Responsible for assessing the risks, including but not limited to fraud, corruption or bribery risks, involved in their area of responsibility.
- Ensure that an adequate system of internal control exists and operates to address these risks.
- Remind DNDi Staff of their obligation to report reasonable suspicions of fraud, corruption or bribery, treat all allegations seriously, and promptly report allegations.

Other Roles

All DNDi Members are expected to use DNDi resources lawfully and responsibly, and to remain vigilant to the risk of fraud. They must report any reasonably suspected fraud, corruption, or bribery through the reporting channels stated within this Policy.

Any attempt at electronic fraud, such as phishing emails, suspicious links, malware, or fraudulent payment requests, should be reported to the Director of IST and the IST Service Desk.

All DNDi Members acknowledge and accept this Policy as an integral part of their contract or engagement with DNDi.

	Reporting	Case Characterization		Case Management & Investigation		Case Closing	
Suspected Perpetrator	**Handling Instance**	**Handling Instance**	**Informed**	**Handling Instance**	**Informed**	**Handling Instance**	**Informed**
Members of a DNDi Body or Executive Director[1]	Chair of Global Board / Chair of Audit Committee / Chair of Committee + Executive Director	FCP Committee (Chair of Global Board, Chair of Audit Committee, Chair of DNDi Body, Executive Director) + relevant expertise	Audit Committee	FCP Committee + relevant expertise	Global Board, Audit Committee	FCP Committee + relevant expertise	Global Board and relevant consultative committees + External Auditor and relevant third parties + Executive Team
Directors and/or major impact	Executive Team Member (line manager) / Executive Director + Strat & Ops Dir / Fin &	FCP Committee, including Executive Director	Audit Committee	FCP Committee + relevant expertise	Global Board, Audit Committee	FCP Committee + relevant expertise	Executive Team + Audit Committee + local Board, if applicable

[1] In the event that the Chair of the Global Board and/or the Chair of the Audit Committee is the subject of the allegation, they shall be excluded from all stages of the process. Their responsibilities under this Policy shall be exercised exclusively by non-conflicted members in accordance with Section C (Governance-Level Recusal and Substitution).

	Plan Director / Legal Aff Director / Sr. RCIC Manager						
Other DNDi Staff and/or minor impact	Executive Team Member/ Line Manager + Strat & Ops Dir / Fin & Plan Director / Legal Aff Director / Sr. RCIC Manager	FCP Committee + relevant expertise	Executive Director	FCP Committee + relevant expertise	Executive Team	FCP Committee + relevant expertise	Executive Team + Audit Committee + local Board, if applicable

References

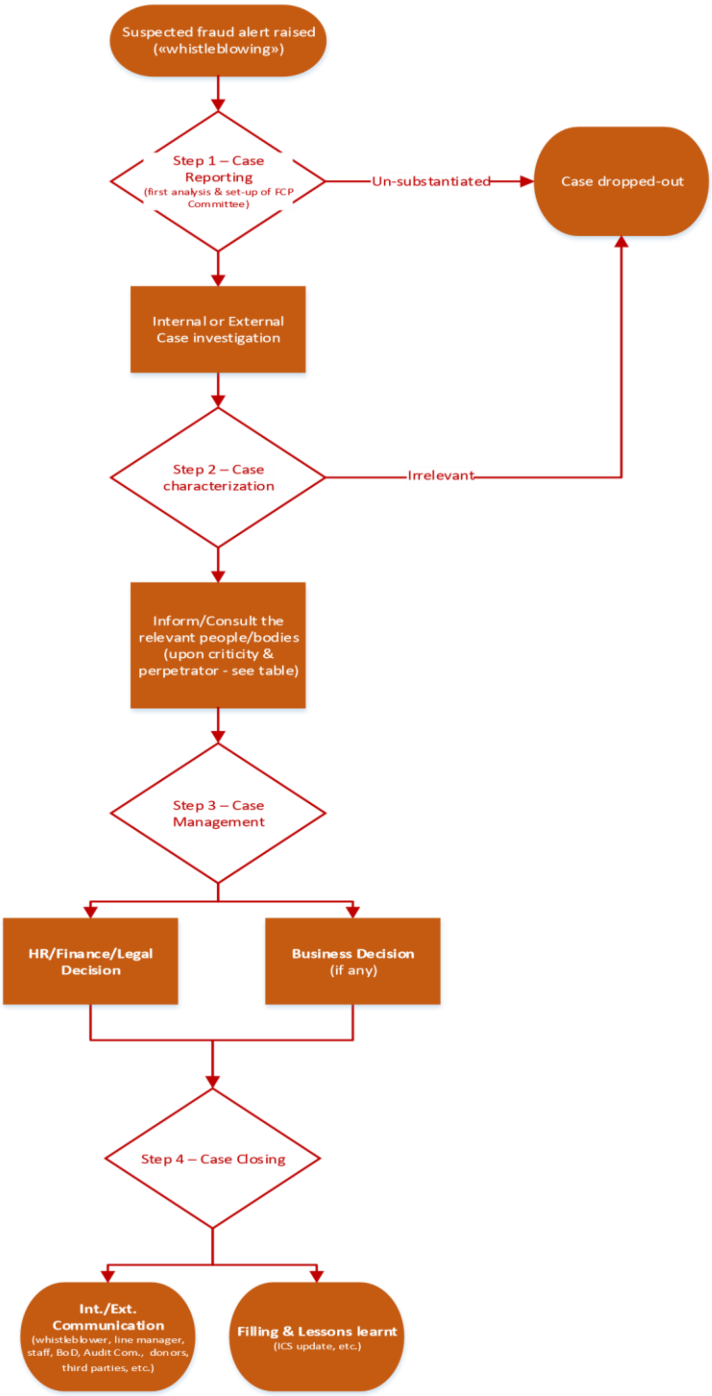
DNDi By-Laws, June 2020

Managing DNDi's Policies, Procedures, Guidelines & Tools, version 1.0, March 2022

Version history

Version	**Reason for change / key changes**	**Effective date**
1.0	Board presentation	3 December 2014
1.1	Policy name change following ICS Steering Committee decision	23 March 2015
2.0	Revised to meet organizational changes	1 March 2022
3.0	Revised to align with Policy & Procedure Framework and to meet organizational changes	1 July 2026

Appendix I: Overall FCP Process[2]



[2] Where the Chair of the Global Board and/or the Chair of the Audit Committee is the subject of an allegation, the recusal and substitution provisions described in Section C (Governance-Level Recusal and Substitution) apply.

Appendix II: Individual Certification Form

CERTIFICATION

I acknowledge that I have read the DNDi Fraud and Corruption Prevention Policy and understand its content.

I understand my obligations to comply with the principles and content of the Policy.

I further understand that any violation of the Policy may subject me to disciplinary measures, including dismissal, termination of my relationship with DNDi, or other penalties, as applicable.

Name: _____________________

Title: _____________________

Date: _____________________

Signature: _____________________