Anti-Fraud and Corruption Policy

Atheer Organization for Development and Innovation

Atheer is committed to using its funds and resources for their intended purposes and to dealing honestly and transparently with participants in its activities, partners and donors. This policy sets out unacceptable conduct, the responsibilities of personnel, and how to report and address misconduct.

1. Scope of the Policy

This policy applies to board members, employees, volunteers, interns, consultants and anyone acting on behalf of Atheer. It covers the handling of the organisation's funds, property, purchases, donations, grants, records and reports.

Relevant obligations for partners, suppliers and contractors are set out in their agreements with the organisation.

2. What Are Fraud and Corruption?

Fraud means deliberately providing false information or concealing important information to obtain a benefit, avoid an obligation, or cause a loss to the organisation or others.

Corruption means abusing a position or authority to obtain an improper benefit. It includes bribery and accepting kickbacks in return for influencing decisions.

Examples of prohibited conduct include:

- Taking the organisation's funds or property, or using them for personal purposes without authorisation.
- Submitting false invoices or receipts, or claiming expenses that were not actually paid.
- Inventing participants, activities or results, or deliberately exaggerating them to obtain funding or justify expenditure.
- Claiming full funding for the same expense more than once, or concealing information about its funding.
- Offering or accepting a bribe, kickback or gift intended to influence a decision.
- Manipulating the selection of suppliers or contractors, or concealing a personal interest that affects the selection.
- Destroying documents to conceal misconduct, obstructing their review, or pressuring someone not to report a concern.

An unintentional error is not considered fraud, but it must be explained and corrected when identified.

3. Protecting the Organisation's Funds and Resources

Atheer is committed to ensuring that expenditure relates to its activities and approved budgets and is supported by documents explaining the purpose of the expense, its amount and the recipient.

The organisation ensures that expenses and financial decisions are reviewed and that no person approves an expense that benefits them personally. Any personal or family interest that may affect purchasing, contracting or selection decisions must also be addressed.

Goods and services are selected according to need, quality and reasonable pricing, with the reasons for selection documented. Where more than one organisation contributes to funding a single cost, each organisation's share must be clearly stated in the records and reports.

4. Responsibilities

The Board of Directors oversees the implementation of this policy, assigns responsibilities and follows up on the handling of misconduct.

The person responsible for financial matters monitors records, supporting documents and expenses, and informs the responsible authority of any discrepancy or matter requiring review.

Activity leads and everyone acting on behalf of Atheer must use resources responsibly, provide accurate information and report concerns that come to their attention during their work.

5. Reporting Misconduct

Anyone may report suspected fraud, corruption or misuse of Atheer's resources through:

info@adi.org.ly

A report should preferably explain what happened, when it happened, the reasons for suspicion, and any available information that can be shared safely. Complete evidence or a specific reporting form is not required. Reports may be submitted without providing a name, with the option of leaving contact details so that clarification can be requested.

If a report concerns the person receiving it or one of the organisation's officials, it may be submitted directly to a board member who is not involved in the complaint. This policy does not prevent the use of reporting channels available through the relevant donor or competent authorities.

6. Confidentiality and Protection from Retaliation

Atheer protects the privacy of reports and shares their information only as necessary for review, investigation or compliance with legal or contractual obligations.

Threatening, mistreating or denying anyone an opportunity because they reported a concern in good faith or cooperated in a review of misconduct is prohibited.

A report that cannot be substantiated does not mean that the person submitting it deliberately lied. Any allegation that someone knowingly provided false information will be reviewed independently and fairly.

7. Adoption and Review

This policy takes effect from the date of its adoption by the authorised body under Atheer's governing rules. It will be communicated to personnel and relevant partners and reviewed at least annually, and whenever improvements are needed based on practical experience or new funding requirements.