POLICY 04

Anti-Fraud, Bribery, Corruption and Whistleblowing

Protecting the funds entrusted to us, and protecting those who speak up

Policy owner	CHIEF OPERATIONS OFFICER	**Approved by**	Board of Trustees
Version	1.0	**Date adopted**	05/08/2026
Applies to	All trustees, staff, volunteers, consultants, contractors, suppliers and partner personnel		
Read with	Conflict of Interest Policy; Code of Conduct; financial controls and procurement procedures		

1. Statement

1.1 Every naira entrusted to Synia Aid Foundation belongs to the people we serve. We have **zero tolerance** of fraud, bribery, corruption and theft, whoever commits them and whatever their seniority.

1.2 We will investigate every credible allegation, pursue recovery, apply disciplinary sanction, and refer criminal conduct to the authorities.

2. Definitions

2.1 **Fraud** is any intentional deception made for personal or third-party gain, or to cause loss to another — including false claims, falsified records, ghost beneficiaries, inflated invoices and misreported results.

2.2 **Bribery** is offering, giving, requesting or accepting any financial or other advantage to induce or reward improper performance.

2.3 **Corruption** is the misuse of entrusted power for private gain, including nepotism, favouritism and the diversion of assistance.

2.4 **Facilitation payments** are small unofficial payments to secure or speed a routine action. **They are prohibited without exception**, notwithstanding local practice.

2.5 The Foundation is a Designated Non-Financial Institution under Nigerian anti-money-laundering law and complies with the reporting obligations that follow from that status.

3. Prohibited conduct

EXAMPLES — NOT AN EXHAUSTIVE LIST

- Taking or diverting cash, goods, fuel, equipment or supplies intended for the people we serve.
- Creating false or duplicate beneficiaries, or signing distribution lists for people who did not receive anything.
- Requesting or accepting payment, a gift or a favour in exchange for selection onto a programme.
- Colluding with a supplier, inflating a quotation, or splitting a purchase to avoid an authorisation threshold.
- Awarding work to a relative, associate or connected business without declaration and open process.
- Falsifying receipts, timesheets, attendance registers, monitoring data or reports to donors.
- Using Foundation funds, vehicles, premises or name for private benefit.
- Offering or accepting any payment to influence an official decision.

4. Prevention

4.1 **Segregation of duties.** No individual may initiate, approve, execute and record the same transaction. In particular, no person both selects a participant and releases their grant, asset or benefit.

4.2 **Authorisation.** All expenditure is approved in advance within the Board-approved budget, at the thresholds set at clause 6.2.

4.3 **Procurement.** Purchases above the threshold at clause 6.2 require written quotations from at least three suppliers, with the specifier and the purchaser being different people.

4.4 **Disbursement.** Grants to participants are released in stages against recorded milestones, never as a single unverified lump sum.

4.5 **Records.** Signed distribution lists, receipts and delivery records are retained for every item issued.

4.6 **Review.** Management accounts are reviewed monthly against budget, and annually by an independent auditor.

5. Whistleblowing — raising a concern

5.1 **Anyone may raise a concern** — trustees, staff, volunteers, participants, community members, suppliers, partners or members of the public.

5.2 Concerns are raised confidentially to INFO@SYNIAFOUNDATION.ORG. Where the concern involves that person, the Founder-Chair or the Chief Operations Officer, it is raised with the nominated independent Trustee at NASBELLA@GMAIL.COM.

5.3 Concerns may be raised anonymously. An anonymous report will still be investigated, though this may limit how fully we can pursue it.

5.4 **Everyone covered by this policy has a duty to report** any suspicion of fraud, bribery or corruption. Failing to do so is itself a disciplinary matter.

PROTECTION FOR WHISTLEBLOWERS

- No person who raises a concern in good faith will be dismissed, disciplined, demoted, excluded from a programme or disadvantaged in any way.
- This protection applies **even if the concern turns out to be mistaken**. You are not required to be right, or to hold proof.
- Retaliation against a whistleblower is itself gross misconduct.
- Your identity will not be disclosed without your consent, except where the law requires it.
- Only a knowingly false or malicious allegation is a disciplinary matter.

5.5 If a concern is not addressed, or the matter concerns the Board itself, it may be raised externally — with the Economic and Financial Crimes Commission, the Corporate Affairs Commission, the Nigeria Police Force, or a funder of the affected programme.

6. Response and thresholds

6.1 Every report is acknowledged within five working days, recorded, and assessed. Where there is a credible risk of continuing loss, immediate protective measures are taken including suspension of the individual and of the payment route concerned.

6.2 **Financial thresholds** are set by the Board on adoption of this policy:

CONTROL	APPLIES ABOVE
Expenditure requiring dual authorisation	₦ 100,000.00
Procurement requiring three written quotations	₦ 100,000.00
Expenditure requiring prior Board approval	₦ 100,000.00

6.3 Investigation is conducted promptly by someone independent of the matter, and may be escalated to an external investigator where the amount or seniority involved requires it.

6.4 Substantiated fraud results in dismissal or termination, recovery of losses, and referral to the appropriate authority. The Board is notified of every allegation within seventy-two hours.

6.5 Where donor funds are affected, the relevant funder is informed promptly and in accordance with the terms of the grant.

7. Gifts and hospitality

7.1 No gift, hospitality or benefit may be accepted where it could reasonably be seen to influence a decision, or be offered in return for support the Foundation provides.

7.2 Modest hospitality in the ordinary course of business may be accepted, and must be declared where its value exceeds the limit set by the Board on adoption: ₦ 1,000.00

7.3 All declarable gifts and hospitality are recorded in the register maintained under the Conflict of Interest Policy.