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Anti-Fraud & Bribery Policy 2026

Reviewed: August 2026

Date of Next Review: August 2027

This policy applies across Camara Education and to all employees, interns, volunteers, consultants and contractors working for or on behalf of Camara Education. We wish to promote a culture of honesty and opposition to fraud, bribery, and corruption in all its forms. The purpose of this policy is to provide:

- A clear definition of what we mean by fraud, bribery, and corruption
- A definitive statement to staff forbidding fraudulent activity and bribery in all its forms
- A summary to staff of their responsibilities for identifying exposures to fraudulent activities and establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent/bribery activity when it occurs.
- Guidance to employees and volunteers as to action which should be taken where they suspect any such activity
- Clear guidance as to responsibilities for conducting investigations
- Protection to employees and volunteers in circumstances where they may be victimised as a consequence of reporting or being a witness to fraudulent/ bribery activities.

Definitions

- **Fraud and theft;**

Fraud is a form of dishonesty involving, amongst other things, false representation, failing to disclose information or abuse of position, which has been undertaken in order to make a gain or cause loss to another. Theft is dishonestly appropriating property belonging to another with the intention of permanently depriving the other of it.

- **Bribery and corruption;**

Bribery is the offering, promising, giving, accepting or soliciting of money, a gift or advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

Corruption is commonly defined as the misuse of public office for private gain.

Policy

Bribery, corruption, fraud and theft in all forms are wrong and unacceptable within the organisation.Camara Education will endeavour to ensure that such practices are prevented and do not occur within the organisation but that if any incident of concern does arise it will be dealt with promptly. Any indications of fraud will be rigorously investigated and dealt with in a firm and controlled way.

Responsibilities of Employees

A. Managers

It is the responsibility of managers to be familiar with the above-defined activity that might occur in their area, be alert for any indication or improper activity and maintain controls to avoid such occurrences. Managers are required to ensure that all staff under their supervision are given a copy of this policy in a language they can understand and acknowledge its receipt. Managers should also ensure that staff be encouraged to report any suspicions to line management and that all concerns are brought to the attention of the Country Director in a prompt manner.

B. All Staff and Volunteers

It is the responsibility of all employees and volunteers to carry out their work in such a way as to prevent fraud, theft, bribery or corruption occurring in the workplace. Employees and volunteers must also be alert for occurrences of fraud, theft, bribery or corruption and be aware that unusual transactions or behaviours could be indications of fraud, and report potential cases or suspicions to their Country Director.

Reporting Suspicions

Employees and volunteers are required to report all suspicions to their line manager in the first instance. If the concern involves their line manager, the Country Director, or if they do not feel able to report through normal management channels, the concern should be reported directly to the CEO or through Camara Education's designated whistleblowing/reporting channel.

Dealing with Reports of Suspected Fraud: Any suspicions of fraud, theft, bribery or corruption will be taken seriously by the organisation. Camara Education expects its managers to deal promptly with any reports received. Managers must immediately notify the Country Director. Where the Country Director may be implicated, the matter must be referred directly to the CEO and/or the Board.

Safeguards for Employees and Volunteers

Issues reported to line management will be investigated with the following safeguards:

- Camara Education recognises that the decision to report a suspicion can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice.
- Camara Education in accordance with its Human Resource Policies will not tolerate harassment or victimisation and will take all practical steps to protect those who raise an issue in good faith.
- Confidentiality: Camara Education will endeavor to protect an individual's identity when he or she raises an issue and does not want their name to be disclosed. It should be understood, however, that an investigation of any malpractice may need to identify the source of the information and a statement by the individual may be required as part of the evidence.

Anonymous Allegations:

Camara Education discourages anonymous allegations, however, concerns expressed anonymously will be considered at the discretion of line management. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the allegations and the supporting facts
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations:

If an allegation is made in good faith, but it is not confirmed by an investigation, Camara Education guarantees that no action will be taken against the complainant. If, however, individuals make malicious or vexatious allegations, disciplinary action will be considered against an individual making the allegation.

Actions Arising from Fraud Investigations

A. Disciplinary procedures

- Camara Education operates a zero tolerance policy on all fraudulent activities.
- Persons who are guilty of fraud, theft, bribery or corruption have committed gross misconduct and will be dealt with in accordance with the HR Policy on Disciplinary Action. Proven allegations of fraud, theft, bribery or corruption may result in dismissal and will be dealt with in accordance with Camara Education's applicable disciplinary procedures and local employment law.
- Where appropriate, Camara Education may refer significant fraud, theft, bribery or corruption to the appropriate authorities in accordance with applicable law. When evaluating a referral, executive leadership must consider the local context and the human rights implications for the individuals involved. In every case, the final decision whether to report an incident to law enforcement rests solely with the CEO of Camara Education.

B. Changes to systems of controls

The investigation is likely to highlight where there has been a failure of supervision or a breakdown or absence of control; the course of action required to improve systems should be documented in the investigation report and implemented when this report is finalised.

C. Recovery of losses

Where Camara Education has suffered loss, full restitution will be sought of any benefit or advantage obtained and the recovery of costs will be sought from individual(s) or organisations responsible for the loss. If the individual or organisation cannot or will not make good the loss, consideration will be given to taking civil legal action to recover losses. This is in addition to any criminal proceedings which may result.

Reviewed August 2026

Ibolya Nemeth, CEO , Camara Education