



ACFE GTA Chapter

Anti-Corruption and Anti-Bribery Policy

INTRODUCTION

The ACFE-GTA Chapter is committed to conducting its activities free from the illegal and improper influence of bribery and to ensuring compliance with all anti-bribery and anti-corruption laws and regulations that may be applicable to its activities world-wide (collectively, "**Anti-Corruption Laws**"). It is essential that our directors, officers, third party vendors or contractors who act on behalf of the ACFE-GTA Chapter, and volunteers (collectively referred to in this Policy as "**those associated with the ACFE-GTA Chapter**") comply at all times with the letter and the spirit of all Anti-Corruption and Anti-Bribery Laws.

OVERVIEW

Bribery is offering, giving, receiving, or soliciting **any item of value** to improperly influence the actions of a person **in order to obtain or retain business or an unfair advantage in the conduct of business; or to induce or reward improper conduct**. "Kickback" is another term for bribery. Bribery can arise in both the public and the private sphere. It can take place directly or indirectly (e.g., through a Third Party). It can take many forms. Anti-Corruption Laws require organizations and businesses to have proactive measures in place to prevent, detect, and address bribery and corrupt practices.

Bribery and corruption are crimes punishable by fines and/or imprisonment. Those associated with the ACFE-GTA Chapter must not engage in any form of bribery or corruption. Whenever asked to make a payment, those associated with the ACFE-GTA Chapter must ensure that they fully understand the reason for the payment, that the payment is legitimate, and seek the *prior approval* of the President or Treasurer prior to any disbursement.

Bribery and corruption have been identified as key factors that limit economic growth and contribute to inequality. By wrongfully benefiting a few individuals, they limit competition; undermine innovation; and corrupt societies. Bribery is also detrimental to organization activities and business in general – studies show that organizations and companies where bribery is condoned have lower levels of productivity and lower morale. Put simply, it is unethical and against the values of the ACFE-GTA Chapter and the Code of Professional Ethics of the Association of Certified Fraud Examiners ("ACFE").

Individuals, organizations, and companies can face civil and criminal charges resulting in large fines, imprisonment, and suspension or in the case of certain suppliers, debarment from government contract processes. Failure to comply puts those associated with the ACFE-GTA Chapter at risk. This could have a very serious impact on the ability of the ACFE-GTA Chapter to achieve its objectives and carry out its mandate.

CONSEQUENCES OF MISCONDUCT

The consequences of violating applicable Anti-Corruption Laws are potentially very serious for the ACFE-GTA Chapter and those associated with the ACFE-GTA Chapter. We will vigorously enforce compliance with this Policy and violations may result in disciplinary action up to and including termination of membership or association or employment with the ACFE-GTA Chapter and referral to law enforcement agencies, as appropriate.

BRIBES MUST NOT BE OFFERED OR ACCEPTED

The ACFE-GTA Chapter prohibits the offering, giving, receiving, or soliciting of any item of value to improperly influence the actions of a person in order to obtain or retain business or an unfair advantage in the conduct of business; or to induce or reward improper conduct. “Items of value” can include:

- Payments of money;
- Extension of credit or loans;
- Travel and accommodations expenses;
- Gifts, meals, and entertainment;
- Political contributions and charitable donations;
- Free use of company services, facilities or property;
- Favors that are of value to a recipient (e.g., offering a job to a member of a person’s family); or
- Anything else of value.

Red Flags

- Cash payments or gifts to individuals or family members
- Inflated commissions
- Inflated invoices
- Fake consultancy agreements
- Unauthorized rebates
- Political or charitable donations; and
- Excessive payment of travel expenses for inappropriate non-business-related travel.

In some cases, simply offering an inducement is unlawful, even if not accepted.

UNDERSTAND the REQUIREMENTS and IDENTIFY RISKS

The first step in compliance is to understand the ACFE Code of Ethics and this Policy, and how it impacts your responsibilities on a day-to-day basis. Knowing what steps to take to prevent risk and to ensure the proper handling of any issues relating to bribery and corruption is essential to compliance.

PROPER DOCUMENTATION and REPORTING

All documentation of financial transactions must be accurate and complete. You should always document your transactions, and report any issues that you become aware of arising under this Policy.

Subject to applicable law, any suspected breaches of this Policy which directly or indirectly affect the ACFE-GTA Chapter must be reported immediately to the President or Executive Vice-President, who acts as the ACFE-GTA Chapter’s Chief Compliance Officer and the ACFE-GTA Chapter’s Chief Technology Officer.

APPROVAL AND IMPLEMENTATION

This policy has been approved by the ACFE-GTA Board of Directors on September 9, 2019 and comes into effect immediately. Questions about the application of this Policy can be directed to the President or the Executive Vice-President and Chapter Chief Compliance Officer.