



Foundation for Healthcare Innovation and Development (FHIND) – Fraud Policy

FHIND values its reputation for financial integrity and recognizes that incidents of fraud may not only result in pecuniary loss, but may also adversely affect its image and reputation. Therefore, the Board of Directors and management are expected to introduce and maintain effective controls to prevent fraud and to ensure that, if it does occur, it is investigated and resolved promptly. Similarly, employees are expected to act honestly and with integrity at all times, and to safeguard the resources for which they are responsible. Employees play a key role in the prevention, detection and reporting of fraud, and they are expected to be vigilant and to report any concerns at the earliest opportunity. FHIND's policy is to limit exposure to fraud by:

- maintaining cost effective procedures to deter fraud, including separation of duties where practical, proper authorization practices, and independent reviews of documentation and/ or summary transaction data;
- adopting formal procedures to investigate fraud when it is suspected or reported;
- promoting a climate of openness and an environment where employees feel able to raise concerns responsibly;
- providing appropriate channels for employees to voice genuine concerns and protecting the confidentiality of those who do so;
- rigorously investigating instances of fraud and pursuing perpetrators to seek restitution of assets fraudulently obtained;
- assisting appropriate authorities in the investigation and prosecution of those suspected of fraud.

For the purposes of this policy statement, "fraud" is defined as the misuse of FHIND's resources or assets by any employee or contractor, for personal gain. Examples of actions constituting fraudulent behavior include:

- misappropriation, misuse or theft of FHIND assets or resources;
- participation in sham or fraudulent transactions;
- payment or receipt of bribes, kickbacks or other inappropriate transactions;
- false accounting including dishonestly falsifying any account or any document required for accounting purposes, or furnishing information which may be misleading, false or deceptive;
- unauthorized disclosure or manipulation of sensitive information;
- forgery or alteration of any document belonging to the Company.

Suspected incidents of fraud should be reported to FHIND senior management or to whistleblower@fhind.org. In accordance with FHIND's Whistleblower Protection Policy, all Directors, Officers and Employees are protected from retaliation for reporting suspected incidents.