

# Assessing Fraud Policy

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Is your fraud policy easily accessible? How is it communicated to the employees?

Is it known to all employees?

What evidence do we have that it is followed?

Is it complete? Does it cover each of the following?

- ✓ A definition of unacceptable behavior, with examples
- ✓ A list of redundant communication channels for reporting wrongdoing, accessible to all employees, vendors, and stakeholders
- ✓ A statement that it is everyone's responsibility to help prevent unethical and illegal behavior
- ✓ It is management's responsibility to understand *and detect* fraud, waste, and abuse in their areas
- ✓ A requirement that everyone must report wrongdoing when they see it
- ✓ A clear identification of whose responsibility it is to investigate wrongdoing
- ✓ A statement that allegations will be reported to management / the audit committee
- ✓ Cover-up and retaliation against witnesses is forbidden
- ✓ A requirement for employees to re-affirm the policy annually

**Langlinois**

Defending against Fraud  
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