

P-CO-7_FRAUD POLICY

1. PURPOSE

The purpose of this fraud policy is to clearly state LEI's commitment to the prevention of corrupt or fraudulent conduct in its business in any form.

2. RESPONSIBILITY

The Managing Director is responsible for ensuring that the fraud policy is applied throughout LEI. Every LEI employee and contractor has responsibility for ensuring that the policy is followed.

3. DEFINITIONS

Fraud is a crime involving the dishonest obtaining of a financial or other benefit, or causing a loss, by deception or other means. The benefit might be of direct value (e.g. money or easy access to money or other assets) or indirect value (e.g. obtaining information by deception and trading that information to obtain more tangible benefits).

The following definitions set out practices that are unacceptable in LEI:

“dishonesty” means a person has intended the act or has been reckless;

“obtaining” means from another person and also includes inducing a third person to do something that results in another person obtaining;

“benefit” is a very broad term and can be tangible or intangible;

“corrupt practice” means the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence the action of a public official in the procurement process or in contract execution;

“fraudulent practice” means a misrepresentation or omission of facts in order to influence a procurement process or the execution of a contract;

“collusive practice” means a scheme or arrangement between two or more Bidders, with or without the knowledge of the borrower, designed to establish bid prices at artificial, non-competitive levels;

“coercive practice” means harming or threatening to harm, directly or indirectly, persons or their property to influence their participation in the procurement process or affect the execution of a contract.

4. POLICY

LEI have a zero-tolerance approach to fraud and all instances of suspected fraud will be treated seriously and dealt with, including investigation, prosecution where appropriate, recovery of losses and the application of appropriate penalties and possible dismissal.

All LEI employees and contractors are responsible for ensuring strong, robust and effective fraud control. All persons should be familiar with the donor agency fraud policy and the link can be provided by the Project & Office Administrator.

Any LEI employee or contractor who knows, or has reason to believe, that a fraud has occurred is responsible for immediately reporting it to his/her immediate superior, Team Leader, LEI Managing Director or through the LEI [Whistleblower Platform](#).

The platform asks for the kind of misconduct being reported, details of the persons involved, when the misconduct took place and a detailed description of the incident. All reports lodged through the platform will be reviewed and actioned by the Chair of the LEI Board, as an independent body external to LEI.

The Managing Director is to ensure that any funding agency (such as DFAT or the World Bank) is notified as soon as possible, and certainly within 5 business days, where the suspected fraud impacts on a contract funded by that agency.

It is expected that all LEI employees and contractors will fully cooperate with management in the investigation of any suspected fraud and make all reasonable efforts to be available to assist those responsible for investigating any incidence of suspected fraud.

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The persons responsible for investigating any incidence of suspected fraud shall treat all information received confidentially. Investigation results will only be disclosed or discussed with those who have a legitimate need to know.

The fraud policy is to be widely disseminated within LEI and with contractors as part of their briefing prior to taking up employment or an assignment on an LEI contract. Further, LEI have adopted a risk management approach to the prevention, detection and investigation of suspected fraud that is incorporated into our business processes, management practices, internal controls and related activities.

SIGN OFF:

LEI BOARD:		Date:	03-04-25
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