



Standard Policies

Signed copies of the following policies are to be attached to all Board Members, Staff, Consultants, Interns and Volunteers

Version: April, 2017

Annex 1: Code of Conduct

Field Ready Contractors and Volunteers shall:

- Conduct all activities with the understanding that the humanitarian imperative comes first.
- Treat everyone with respect, loyalty, patience, integrity, courtesy, dignity and consideration.
- Respect the culture and customs of the communities we serve.
- Be motivated by the altruistic desire to help those in demonstrable need. Aid is given regardless of the race, creed or nationality of the recipients and without adverse distinction of any kind.
- Strive to behave in such a manner as to not bring disrespect or dishonor to Field Ready or fellow Contractors and Volunteers.
- Always comply with health and safety laws and regulations, as well as with Field Ready guidance covering health, safety and security.
- Adhere to the highest ethical standards. Field Ready places people at the center of our work. All Contractors and Volunteers must make every effort to ensure that no harm occurs as a result of our activities. We must perform actions that ultimately promote the rights, dignity and capabilities of people affected by disasters. Whenever innovative activities are undertaken, they must be done with fairness, equity and accountability.
- Understand and follow Field Ready's policies and procedures.

I have read and/or someone has read this policy to me. I understand the contents of this policy and that I am responsible for complying with its provisions. I further understand that failure to comply with this policy will result in disciplinary action which may include termination.

Name (Print):

Signature:

X

Date:

Annex 2: Protection, Harassment and SEA (Sexual Exploitation and Abuse) Policy

Field Ready strongly believes in the human dignity of each individual. We follow humanitarian principles throughout our approach to programming and in our relations with our Team Members and the people we assist. This is spelled out in the Code of Conduct for the “International Red Cross and Red Crescent Movement and NGOs in Disaster Relief” and other documents including the Convention on the Elimination of Discrimination against Women (CEDAW).

Field Ready strongly condemns and prohibits any behavior on the part of any Field Ready Contractor, Volunteer or consultant (“Team Members”), Executive Director or Board of Directors member which constitutes anything that infringes upon the rights and dignity of others. This would include sexual harassment, sexual exploitation or sexual abuse towards any other Team Member or beneficiary of a Field Ready program or activity. Field Ready is committed to providing a work environment that is free from discrimination and harassment. Field Ready is also committed to protecting vulnerable individuals from any and all forms of abuse and exploitation, including physical, mental or sexual. This Annex shall apply to all Team Members, the Executive Director and Board of Directors members.

Please note: The utmost care should be made so that Team Members do not place themselves in a position where one is made vulnerable to allegations of misconduct.

Field Ready prohibits any and all conduct that may reasonably be interpreted as abuse and exploitation as defined above, regardless of whether or not such conduct meets the technical legal definition of criminal abuse or exploitation. Examples of this may include, but are not limited to: doing things of a personal nature for someone that they can do for themselves; condoning or participating in behavior that is illegal, unsafe or abusive; spending excessive time alone with vulnerable people; discriminating against any individual; and showing unfair treatment or favor to any individual over others.

Taking of images of vulnerable people (photography and video) is also strictly controlled and must be authorized by Field Ready. Furthermore, written permission is required for any distribution of a photo or video. Please refer to Field Ready’s Style and Branding Guide for further information.

Sexual Harassment

Sexual harassment includes, but is not limited to: unwelcome sexual advances, requests for sexual favors and other verbal, nonverbal or physical conduct or communication of a sexual nature when:

1. The submission to such sexual conduct or communication is either implicitly or explicitly made a term or condition of an individual's employment or volunteer opportunities. Or the submission to such sexual conduct or communication is either implicitly or explicitly required for a beneficiary's initial or on-going access to the programs, services or materials supplied by Field Ready; or
2. The submission to or rejection of that sexual conduct or communication is used as a basis for employment decisions affecting the individual's employment, volunteer opportunities or education; or a beneficiary's initial or on-going access to the programs, services or materials supplied by Field Ready; or
3. The conduct or communication has the purpose or effect of substantially interfering with an individual's employment or volunteer opportunities or a beneficiary's access to Field Ready programs, services or materials supplied by Field Ready; or

4. The conduct or communication creates an intimidating, hostile, or offensive working environment. Actions, words, jokes, or comments based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristic are not acceptable.

Sexual harassment includes harassment of women by men, of men by women, and same-sex harassment. Field Ready prohibits any and all conduct that may reasonably be interpreted as harassment as defined above, whether or not such conduct is pervasive enough or severe enough to meet the technical legal requirements of harassment.

Sexual Exploitation and Abuse (SEA)

Sexual Exploitation and Abuse occurs when a position of power is used for sexual purposes against a beneficiary or vulnerable member of the community. SEA can be defined as the act of coercing, luring or engaging a vulnerable individual in a sexual act, involvement in the sex trade, or pornography, with or without consent, in exchange for goods and services, money, drugs, shelter, food, protection or any other necessity or item of value. The following activities are prohibited when working with vulnerable communities and beneficiaries and are considered abusive when:

1. The submission to such sexual conduct or communication is either implicitly or explicitly made a term or condition of a beneficiary's initial or on-going access to the programs, services or materials supplied by Field Ready; or
2. The submission to or rejection of that sexual conduct or communication is used as a basis for a beneficiary's initial or on-going access to the programs, services or materials supplied by Field Ready; or
3. The conduct or communication has the purpose or effect of substantially interfering with a beneficiary's access to Field Ready's programs, services or materials supplied by Field Ready; or
4. The conduct or communication creates an intimidating, hostile, or offensive working environment; or
5. The conduct is inappropriate, unprofessional and unethical for humanitarian workers as in the case of sex with commercial sex workers and prostitutes.

Field Ready is further committed to ensuring that all Team Members are made aware that they are expected to comply with the policy. In our normal recruitment and hiring process, each Team Member agrees to undergo training and sensitization to the issue (currently, through the following training tool: <https://www.interaction.org/courses/sea101/index.html>)

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Annex 3: Child Protection Policy

Field Ready strongly condemns and prohibits any behavior on the part of any Field Ready Contractor, Volunteer or Consultant (“Team Members”), Executive Director or Board of Directors member which constitutes anything that infringes upon the rights and dignity of others. Field Ready is committed to protecting children from any and all forms of abuse and exploitation, including physical, mental or sexual. This Annex shall apply to all Team Members, the Executive Director and Board of Directors members and shall be enforced in conjunction with Field Ready’s SEA (Sexual Exploitation and Abuse) Policy. Additional guidance is provided in Field Ready’s staff handbook and communications documents (i.e., Style and Branding Guide for use of images).

Field Ready is committed to conducting our activities in a manner that is safe for all children with whom we may be in contact. All Field Ready representatives are explicitly prohibited from engaging in any activity that may result in any kind of child exploitation or abuse. In addition, it is Field Ready’s policy to create and proactively maintain an environment that aims to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children at the risk of any kind of exploitation or abuse.

Definitions and Policies on Terms

Child protection is the safeguarding of children (individuals under the age of 18 years old) from exploitation and abuse. Exploitation is defined as the act of using a child for profit, labor, sexual gratification or other personal/financial advantage including trafficking.

Abuse is defined as the infliction of physical or emotional injury through intentional beatings, uncontrolled corporal punishment, persistent ridicule and degradation, neglect or sexual abuse. Any form of abuse is absolutely forbidden and constitutes a serious breach of this child protection policy. There are four universal categories of child abuse that would apply to both children and other vulnerable individuals:

1. **Sexual Abuse:** Child sexual abuse includes the actual or threatened sexual exploitation of a child including all forms of sexual activity such as rape, incest and pornography. Examples of this include engaging in sexual activity or having a sexual relationship with a child regardless of the age of majority/consent or custom locally. An underage child cannot legally give informed consent to sexual activity. Field Ready considers sexual activity with a child (with or without their consent) to be a serious issue that will result in disciplinary action being taken, including termination, and the pursuit of any other available legal remedy. This includes consensual sexual activity with a child over the legal age of consent of the country in which s/he lives and/or in which the offense occurs, but below 18 years. Mistaken belief in the age of a child is not a defense. Child sexual abuse also includes behaving in a physically inappropriate or sexually provocative manner, sleeping in the same bed or same room as a child, or allowing a child with whom one is working to stay overnight at a home unsupervised.
2. **Physical Abuse:** Physical abuse includes the actual or likely physical injury of a child or a failure to prevent physical injury or suffering. Examples of this include hitting, kicking or otherwise assaulting children.
3. **Neglect:** Child neglect can include the failure to protect a child from exposure to excessive heat/cold, starvation, dehydration or other dangers. It can also be the failure to carry out important aspects of care resulting in the impairment or potential impairment of the child’s health or

physical/emotional development. This includes acting in ways that may be abusive or may place a child at risk of abuse.

4. **Emotional Abuse:** Emotional abuse includes the actual or likely severe adverse effect on the emotional *and* behavioral development of a child caused by persistent or severe emotional mistreatment or rejection. All abuse involves emotional mistreatment. This includes, but is not limited to, such as examples as: developing relationships with children that could be deemed exploitative or abusive; using inappropriate, offensive or abusive language; and making suggestions or offering advice which is inappropriate, offensive or abusive. It also involves acting in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse.

Child Protection Stance

Field Ready is committed, through awareness, good practice and training, to minimize the risks to children and take positive steps to help protect children who are the subject of any concerns. We follow humanitarian principles throughout our approach to programming and in our relations with our Team Members and the people we assist. This is spelled out in the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief and other documents particularly the Convention on the Rights of the Child (CRC). Field Ready's policy is to ensure compliance with host country and local child welfare and protection legislation, or international standards, whichever affords greater protection, and with US law, where applicable.

Field Ready management, which is ultimately responsible for this policy, is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions in response to any violation. This applies to all relevant individuals (including those who committed a child protection violation and/or anyone who knew of such child safeguarding violation but failed to act). Field Ready management will take steps following any findings of a violation of this child protection policy to review its policies and procedures in order to identify and address any gaps or weaknesses that may have contributed to such violations occurring in the first place.

Everyone connected to Field Ready is expected to conduct themselves in a manner consistent with this commitment and obligation (including being cognizant of inadvertent actions such as taking images). Any violations of this policy will be treated as a serious issue and will result in disciplinary action being taken, including termination and any other available legal remedy.

Although Field Ready's work does not normally involve direct contact with children, our preventive and response procedures will automatically increase in those contexts where our activities may put Team Members in proximity with children. These actions include:

- **Assessment:** A detailed child protection risk assessment (including mapping and reporting) will be carried out. In cases where children are directly involved in a project or activity, additional steps to link with the local child protection mechanism will be taken.
- **Recruitment:** Field Ready is committed to ensuring everyone knows the steps to take and whom to contact when concerns arise regarding child protection. In cases where children are directly involved in a project or activity, an additional screening of on site Team Members may be required, and this may include updated criminal background checks.
- **Training:** Field Ready is further committed to ensuring that all Team Members are notified of and made aware that they are expected to comply with child protection policy. In our normal recruitment and hiring, each Team Member agrees to undergo training and

sensitization to the issue of child protection offered through Keeping Children Safe and Disaster Ready. In cases where children are directly involved in a project or activity, additional/refresher training may be required.

Reporting, Investigation & Referral

Field Ready is committed to engaging in action that: 1) supports and protects children when concerns arise regarding their wellbeing; 2) supports those who raise such concerns; 3) investigates or cooperates with any subsequent investigation; and 4) takes appropriate corrective action to prevent the recurrence of such activity. These policies apply equally to all children regardless of ethnicity, gender, age, religion, disability or sexual orientation.

If any Field Ready Team Member, Executive Director, Board of Directors member, beneficiary or any other person(s) believes s/he has either witnessed or been the victim of abuse, harassment or exploitation during the course of work at Field Ready, s/he is expected to act quickly and get help. This involves taking every action possible to ensure that the victim is removed from the abusive or exploitative environment immediately. If any type of misconduct is suspected, the Team Member should report concerns in the following order:

- Field Ready Supervisor and/or child protection focal point (or, if not appropriate)
- Field Ready Executive Director (or, if not appropriate)
- Board of Directors (Trustees)

Field Ready Team Members who work with vulnerable individuals are mandated to report any violation of this policy immediately. The report may be made in person or in writing and shall be submitted to the Contractor's or Volunteer's supervisor, or, if the supervisor is suspected to be involved in the misconduct, Field Ready's Executive Director. Under no circumstances are victims required to report the incident to the person involved in the misconduct or to a supervisor, whether or not the supervisor is alleged to be responsible for the misconduct. Care should be made so that Team Members do not place themselves in a position where one is made vulnerable to allegations of misconduct.

At the same time, knowledge of child protection concerns must be reported to the appropriate referral pathway in the country or area. This will either be through the legitimate governing authority or, particularly where this does not exist or is in question, through the lead Child Protection Agency.

All Field Ready Team Members have a duty to manage sensitive information in a manner that is respectful, professional and that complies with the applicable law. Team Members must keep all information about any suspected or reported incidents strictly confidential, and must divulge only that information to the reporting lines involved in the investigation (mentioned above), except as required by law. Retaliation of any kind is strictly prohibited and will not be tolerated. Any retaliation committed against a reporting party will result in immediate termination.

All Field Ready Team Members are required to report instances of misconduct truthfully and responsibly and to cooperate fully in the investigation. Any Field Ready Team Member who is alleged to have sexually harassed or engaged in other sexual misconduct will be suspended with pay pending the outcome of the investigation. If Field Ready determines that misconduct has occurred, prompt remedial action will be taken, including the termination of the Field Ready Contractor and Volunteer Agreement. Intentional false reporting of sexual harassment and misconduct is also prohibited and will result in termination of the Field Ready Contractor and Volunteer Agreement.

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X

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Annex 4: Whistle-blowing Policy

Field Ready believes strongly in accountability, transparency and the respect for individuals. All Contractors, Volunteers, and consultants (“Team Members”), the Executive Director, and Board of Directors members are encouraged to raise genuine concerns about possible misconduct in our operations, whether in matters of financial reporting or in any other matter not specifically addressed in Annexes 2, 3 and 5. This is particularly important when the possible misconduct may negatively impact the beneficiaries of Field Ready.

This policy is designed to:

- Support the values and mission of Field Ready.
- Ensure that Team Members can feel comfortable raising concerns without fear of retribution.
- Provide a transparent and confidential process for dealing with concerns including, but not limited to: financial transactions, financial reporting, fraud/corruption, bribery, blackmail, criminal offenses, failure to comply with legal or regulatory obligations, miscarriage of justice; endangering the health and safety of other individuals; endangering the environment; concealment of any of the foregoing concerns.

This policy extends to all Field Ready activities (including cyberspace) and extends to Team Members, the Executive Director, Board of Directors members and other partner and beneficiary organizations with which we work.

Duties and Obligations of Team Members

1. If any Team Member has a concern about possible misconduct, s/he is obligated to report it immediately, either orally or in writing. Any such report should include full details and, if possible, supporting evidence. If a report is made anonymously, it is more difficult for Field Ready to take action. Reports should not be made anonymously unless the Team Member believes there is no other alternative. Team Members should report any concerns in the following order:
 - Field Ready Supervisor (or, if not appropriate)
 - Field Ready Executive Director (or, if not appropriate)
 - Board of Directors (Trustees)
2. Team Members who in good faith raise concerns covered by this policy shall be treated fairly and protected from victimization and other detrimental treatment.
3. Team Members shall fully cooperate with any investigations conducted by Field Ready.

Duties and Obligations of Field Ready

Field Ready shall treat all concerns brought to our attention seriously and in accordance with this policy.

1. Field Ready shall consider whether the alleged misconduct falls under the area of “whistle-blowing” contained in this annex or whether another policy (Annex 2: Protection, Harassment and Sexual Exploitation Policy; Annex 3: Child Protection Policy or Annex 5: Anti-Fraud, Anti-Terrorism & Anti-Corruption Policy) may better apply to the alleged misconduct.
2. If the alleged misconduct is determined to fall under this whistle-blowing policy, such allegations shall be reported in the order consistent with which Team Members shall report:
 - Field Ready Supervisor (or, if not appropriate)
 - Field Ready Executive Director (or, if not appropriate)

- Board of Directors (Trustees)
3. If Field Ready determines that an investigation is warranted, we shall conduct a thorough and confidential investigation to the extent possible. Complete confidentiality protecting the identity of the Team Member will not always be possible. If a Team Member's identity must be disclosed, s/he will be advised prior to disclosure unless there is legal requirement or police advice not to do so.
 4. In the course of any investigation, Field Ready shall ensure that any person accused of alleged misconduct is fairly treated at all times and has the right to present his/her own account of events as early as possible during the investigation.
 5. Field Ready will investigate, and treat as a serious matter:
 - Allegations made by a Team Member which are not in good faith and are found to be false or malicious
 - Actions by a Team Member intending to either prevent a fellow Team Member from making a confidential report or victimize that Team Member for raising concernsIntentional false reporting of misconduct is prohibited and will result in termination of the Field Ready Contractor and Volunteer Agreement.
 6. Field Ready shall provide feedback to those who raise concerns in connection with this whistle-blowing policy. Such feedback shall include what steps have been taken to investigate and address the concern. Under certain circumstances, however, there may be a delay in giving feedback or a limit to what can be shared based on the advice of police and/or legal counsel.

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X

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Annex 5: Anti-Fraud, Anti-Terrorism & Anti-Corruption Policy

I. Introduction – Fraud and Corruption Defined

Fraud is defined in this policy as an act carried out either by an internal source (Contractors, Volunteers, and consultants (“Team Members”), the Executive Director, and Board of Directors members) or external source (anyone else) with the deliberate intention of deceiving Field Ready, our donors, beneficiaries or the general public to either gain an advantage or cause loss. Similarly, corruption is dishonest or illegal conduct by those in power. Fraud and corruption include acts varying from theft to false accounting, from the builder who dishonestly conducts unnecessary repairs to the candidate who claims false qualifications on his/her job background. It may involve not telling the truth, failing to say something when a policy is at risk or abusing a professional position.

As defined by Field Ready, fraud and corruption include prohibited conduct such as:

- **Kickbacks:** No person shall provide or attempt to provide, solicit, accept or attempt to accept any item of value or necessity.
- **Influence:** No person may solicit, offer or accept any offer to exert economic, political or personal pressure or influence on another person for the benefit of any person, in return for a preference, favorable decision, or other advantage in an existing or proposed transaction.
- **Conflict of Interest:** Team Member conduct should not foster any suspicion of conflict between professional duty and personal interest.
- **Bid-Rigging:** With regard to any bid, request, proposal, or offer of assistance, no person shall agree with another person, who is, or except for such agreement would be, a competitor of such person to eliminate, limit or dilute competition or improperly influence or try to improperly influence, the making of an award, grant, contract or undertaking of any humanitarian organization.
- **Gifts:** No person may solicit, offer or accept any gift or thing of value greater than \$20 from any other person where there is an actual or potential business relation between such parties.
- **Grant Rotating:** No person shall engage in any agreement or collusive scheme to rotate or distribute among selected or predetermined persons the award of grants, contracts, or offers of assistance in contravention of the established policies of any donor humanitarian organization.
- **Discrimination:** In selecting suppliers, Field Ready shall not discriminate among them based on reasons irrelevant to stated purchasing requirements, including reasons concerning but not limited to the supplier’s gender, race, religion, age, or ethnicity.

II. Field Ready’s Position on Fraud and Corruption

Field Ready has zero tolerance of fraud and corruption of any type or in any circumstances, whether perpetrated by Team Members, the Executive Director, Board of Directors members, partner or beneficiary. Fraud reduces our ability to help people in crisis. It is reprehensible for anyone to attempt to defraud a charity because this is in effect stealing from the most vulnerable and needy.

Likewise, we must ensure that we are not used to assist in money laundering, terrorism or any other nefarious or unlawful activity. The policy and procedures outlined here are designed to prevent those circumstances from arising in the first place.

Field Ready expects that its Team Members, Executive Director, Board of Directors members, partners and beneficiaries will have the highest standards of honesty at all times and will report all instances of fraud and corruption immediately. Specifically, this policy explicitly provides that:

1. No funds or assets will be used for any unlawful or improper purpose.
2. No political contributions will be made from Field Ready funds in any country, even in countries where such contributions may be legal.
3. Gratuities, business entertainment, meals and gifts that are both lawful and customary may be permissible, but may not be allowable. However, no payments, gratuities, or gifts will be made, directly or indirectly, to any official or employee or other Government or any Government agency.
4. Financial data required to be submitted to donors, including governments, must be accurate, complete and current and prepared in accordance with applicable grant requirements, where appropriate.
5. No payments will be solicited or received by a Team Member or relative of a Team Member from a vendor or sub grantee or prospective vendor or sub grantee.
6. Payments to agents, brokers or middlepersons may be made where required in the normal course of business to secure goods and services for Field Ready taking care that such payments are in line with prevailing practice. Agents' compensation must be reasonable in relation to the services performed and will not exceed the normal rate for transactions of a similar nature and size in the particular location.
7. All financial transactions will be accounted for accurately and properly. No undisclosed or unrecorded funds or assets will be established or maintained for any purpose.
8. Payments/cash transactions will be made only into and from bank accounts approved by Field Ready's Executive Director.

Field Ready requires its Team Members, Executive Director and Board of Directors members to abide by the foregoing standards of ethical behavior in their dealings with its suppliers, consultants, sub-grantees, subcontractors, and governments. Again, they are required to report any violations of these standards.

A special note on terrorist financing / excluded entities

Field Ready takes every step to ensure that we are not inadvertently used by either an individual terrorist or terrorist organization. In the past, government authorities have been concerned about suspicious persons working for charities in various countries who used their positions for terrorist aims. Another concern is that an employee may use the charity's funds to support the terrorist aim rather than for the purpose that was originally intended.

Field Ready reserves the right to perform background checks on its Team Members, and these background checks may be updated every six months. Additionally, Field Ready performs due diligence to ensure that vendors and partners are not affiliated with any individual terrorist or terrorist organization/entity sanctioned or restricted by the US Federal Government or the United Nations. Specifically:

- **Terrorist Financing:** Field Ready cannot procure from firms/individuals who are considered "Specially Designated Nationals". Refer to: www.treasury.gov/offices/enforcement/ofac/sdn
- **Excluded Parties:** Field Ready vendors must be eligible for US Government contracts and must not appear all or in part on the registry of "Lists of Parties Excluded from Federal Procurement

and Non-procurement Programs”. Refer to:

www.dol.gov/ofccp/regs/compliance/preaward/debarlst.htm

- **Source-Origin-Nationality:** Under no circumstances may goods or services be purchased, supplied from, contain any parts from, be manufactured in, or be shipped through any “foreign policy restricted countries”. The Office of Foreign Assets Control of the US Treasury (OFAC) administers a number of different sanctions, blocking the assets and restricting trade to accomplish US foreign policy and security goals. Refer to:
<https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>
The United Nations Security Council also maintains a sanctions list. Refer to:
<https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>

Preventing and detecting fraud and corruption

All Team Members, the Executive Director, Board of Directors members, partners and beneficiaries are responsible for fraud prevention and detection at Field Ready. All are obligated to report suspected fraud and corruption immediately (see section IV on Reporting below).

Promoting an Anti-fraud and Anti-corruption Culture

Field Ready purposely recruits and retains Team Members who have a proactive attitude to protecting and making best use of its assets in accordance with our vision and mission. This attitude is reinforced by our code of conduct and other policies and procedures contained in the Field Ready Contractor and Volunteer Agreement and its Annexes.

Deterrence and detection

Team Members, the Executive Director and Board of Directors members are responsible for reducing opportunities for fraud and corruption and improving detection rates. This can be achieved this by:

1. Identifying the risks to which operations, locations and assets are exposed
2. Maintaining/reinforcing adequate controls
3. Ensuring effective compliance with controls

Well-designed and cost effective controls include, but are not limited to, the following:

- Thorough Team Member recruitment procedures
- Physical security of assets, from computers to petty cash
- Clear organization of responsibilities and reporting line
- Adequate staffing levels
- Supervision and checking of output/performance monitoring. This may include random spot checks
- Segregation of duties to ensure that key functions and controls are not performed by the same Team Member
- Rotation of Team Members if appropriate (where long-term staff are employed)
- Complete and secure audit trails
- Budgetary and other financial reports in accordance with Generally Accepted Accounting Principles (GAAP). Audited financial reporting if appropriate.

Major deterrents to perpetrating fraud and corruption are the risk of being caught and the severity of the consequences. Field Ready will always take robust action, including prosecution, against those who

commit fraud. Most frauds (over 50%) are discovered through the normal operation of controls. Information from third parties accounts for around 30% of cases.

Because they are protected under the whistle-blowing policy (Annex 4), Team Members should report suspicions of fraud. Partner organizations, beneficiaries, suppliers, or other individuals/ organizations are also encouraged to report their suspicions. In addition to reporting the fraud to the police, Field Ready will actively pursue the recovery of assets using all legal means.

III. Working with Partner Organizations

When working with partner and donor organizations (including accepting resources from donors) due diligence may be used to detect and prevent fraud or corruption within these organizations. Without this due diligence, Field Ready could risk being inadvertently associated with an individual or organization that engages in illegal activities or other activities inconsistent with our vision, mission and other policies contained herein. Examples of due diligence include, but are not limited to ensuring:

- partners' financial reports and proposed budgets are thoroughly reviewed prior to any partnership with Field Ready
- that a thorough, documented partner assessment is undertaken prior to engagement to assess the partner's control environment
- that Field Ready policies are shared and understood by partner staff, where partner's own policies are considered inadequate, conflicting or do not exist (e.g. procurement policy)
- a signed partnership agreement supports all work with partners

IV. Reporting

Field Ready's policy is that Team Members, the Executive Director, Board of Directors members, partners and donors conduct their activities morally, ethically, and in the spirit of accountability and transparency, and in conformity with applicable laws, regulations and practices common to responsible corporations and non-government organizations. This is intended to prevent corruption and other types of fraud.

It is the responsibility of all Team Members, the Executive Director and Board of Directors members to report any suspicions of actual or attempted fraud/corruption. Team Members who in good faith raise concerns covered by this policy shall be treated fairly and protected from victimization and other detrimental treatment. Team Members shall fully cooperate with any investigations conducted by Field Ready.

All reports of suspected fraud or corruption will be investigated. Control weaknesses identified as a result of reported instances will be addressed immediately to help prevent future similar occurrences. If any type of misconduct is suspected, the Team Member should report concerns in the following order:

- Field Ready Supervisor (or, if not appropriate)
- Field Ready Executive Director (or, if not appropriate)
- Board of Directors (Trustees)

If a report is made anonymously, it is more difficult for Field Ready to take action. Reports should not be made anonymously unless the Team Member believes there is no other alternative.

Intentional false reporting of misconduct is prohibited and will result in termination of the Field Ready Contractor and Volunteer Agreement.

V. Investigation Procedures

Once a suspected case of misconduct is reported, the suspected Team Member(s) will be placed on administrative leave while the investigation is carried out. During the course of any investigation, Field Ready shall ensure that any person accused of alleged misconduct is fairly treated at all times and has the right to present his/her own account of events as early as possible during the investigation.

Field Ready shall respect local laws and the inquiry will be carried out in as an efficient manner as possible. If, in the course of the investigation, it is determined fraud or corruption was indeed attempted or carried out, the Team Member's Contractor and Volunteer Agreement will be immediately terminated and the Team Member may be subject to legal proceedings.

If Field Ready determines that an investigation is warranted, we shall conduct a thorough and confidential investigation to the extent possible. Complete confidentiality protecting the identity of the Team Member will not always be possible. If a Team Member's identity must be disclosed, s/he will be advised prior to disclosure unless there is legal requirement or police advice not to do so.

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Name (Print):

Signature:

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