

Fraud Policy (Global)



DT Global

1. Background

DT Global delivers international development services globally, working with clients in the public and private sectors to achieve a positive and lasting impact on the lives of people around the world.

2. Policy Statement

DT Global conducts its business in an ethical manner and with the highest standards of integrity. We have a 'zero tolerance' approach to fraud.

We have a responsibility to protect the assets, funds, information, and integrity of DT Global, our clients and our partners. In doing so, we maximise the effectiveness of the programs we manage, and we protect the reputation of DT Global, our personnel, and our clients.

3. Purpose and Scope

The objective of this policy is to apply these principles across all work that we undertake and ensure that DT Global takes all possible steps to prevent, detect, and respond to fraud.

The DT Global Fraud Policy applies to all DT Global personnel (employees, volunteers, visitors, interns, trustees, board members, subsidiaries, sub-contractors/consultants, associates, and partners, including downstream partners and grantees).

This policy is intended to be read in conjunction with the:

- DT Global Code of Business Ethics and Conduct,
- DT Global Anti-Corruption Policy, and
- DT Global Fraud Control Procedures.

4. Definition

Fraud is a crime which involves dishonestly obtaining a benefit, or causing a loss, by deception or other means.

In this definition, "benefit" refers to both tangible items, such as money or objects, and intangible benefits, including power, status, or information. This may include:

- Theft
- Accounting fraud (false invoices, misappropriation, etc.)
- Unlawful use or obtaining of property, equipment, material, or services
- Causing a loss, or avoiding and/or creating a liability
- Providing false or misleading information
- Failing to provide information when there is an obligation to do so
- Misuse of assets, equipment, or facilities

- Making or using false, forged or falsified documents
- Wrongfully using information or intellectual property.

For the purposes of DT Global's policy and related procedures, 'fraud' may refer to any potential, suspected, or actual fraud, including corruption.

5. Elements of DT Global Zero Tolerance Approach

Investigate	Upon report of any potential, suspected, or actual fraud or corruption, DT Global will conduct an investigation in accordance with any applicable government investigation standards and the laws of the jurisdiction in which the fraud incident occurred
Apply penalties	Following investigation, apply any contractual remedies or penalties, and/or follow termination procedures
Report to authorities	Fraud will be reported to local authorities in accordance with guidance received from General Counsel and the client's instructions , should the fraud involve client funds
Recover funds	Take appropriate action to recover funds
Timely case management	Manage fraud cases proactively, in a timely manner, in consultation with the client and close with client permission, when all elements of the zero tolerance approach have completed

6. DT Global's Fraud Management Principles

To manage the risk of fraud DT Global will:

- Act in an ethical manner at all times, even if there is a cost to doing so
- Act diligently and proactively to prevent, detect, and respond to fraud
- Be fraud aware – review your contractual obligations, client policies, and internal reporting procedures
- Promptly (within 1 day) report any potential, suspected, or actual fraud (see reporting options below)
- Investigate fraud reports confidentially, in a timely manner, applying the presumption of innocence under the guidance of General Counsel
- Ensure appropriate accountability and strengthening of controls
- Build capacity in others we work with, promoting awareness of the impacts of fraud, our 'Zero Tolerance' approach to fraud, and our relevant policies and procedures
- Ensure anyone who reports fraud or corruption does not face any retaliation in relation to their employment or engagement with DT Global
- Close fraud cases with approval from General Counsel when all elements of the zero tolerance approach have been completed

7. How to Comply

Complete assigned fraud training and any ongoing training or refresher courses

Follow DT Global procedures and keep accurate, complete records

Check and comply with contract terms when appointing/ changing approved subconsultants or projects personnel

Act in a transparent, ethical and lawful manner at all times

Promote awareness of DT Global 'Zero Tolerance' approach to fraud

Understand and comply with clients' fraud policies

Report and ask questions if something doesn't seem right

8. How to Report

To report a potential, suspected or actual fraud, contact any of the following:

- Your supervisor or manager
- DT Global Senior Management
- DT Global General Counsel (generalcounsel@dt-global.com) or
- DT Global Ethics Hotline

URL: qrs.ly/DTGlobalEthicsHotline

QR Code:



Email: speakup@coreintegrity.com.au

Phone: 1800 765 692 (Australia)
900 998 400 (Spain)
1 (800) 203-7008 (USA)
+61 2 9053 9285 (Rest of World)

PO Box: PO Box 895, Darlinghurst,
New South Wales, Australia, 1300

Further reporting options may be available - please refer to the DT Global Fraud Procedures for your geography.

9. Resources & Contacts

The following documents provide useful resources to guide implementation of this policy

- DT Global Code of Business Ethics and Conduct
- DT Global Fraud Control Procedures
- DT Global Fraud Awareness Training
- DT Global Anti-Corruption Policy
- [DFAT Fraud Strategy Statement](#)
- [DFAT Fraud Control Toolkit](#)
- [DFAT Fraud Referral Form](#)
- [World Bank Combatting Fraud and Corruption](#)
- [USAID Fraud Awareness Handbook](#)
- [USAID Office of Inspector General Hotline Report Form](#)
- [U.S. Department of State Office of Inspector General Fraud Indicators](#)
- [U.S. Department of State Office of Inspector General Hotline Submission Form](#)
- [U.S. Department of Defence Office of Inspector General Hotline](#)
- [Europaid General Conditions for Service Contracts](#)

If you have a question or any feedback to share, please contact DT Global General Counsel here.

10. Version Control and Change History

Version Control	Effective Date	Approved by	Amendment
V1.0	19 Aug 2019	Frank Maiolo	First Version
V2.0	13 August 2020	Torge Gerlach	Global format, elements of zero tolerance approach added, Fraud Management principles updated, DT Global Ethics Hotline contact details added, Resources and Contacts updated