

OurResearch Anti-Fraud & Bribery Policy

(Approved by the Board: July 16, 2025)

1. Purpose

We are committed to using every grant dollar responsibly to achieve the purposes of the grant and the mission of OurResearch. This policy explains how we prevent, detect, and deal with fraud or bribery.

2. Scope

Applies to all staff, contractors, volunteers, and Board members, anywhere in the world, at all times.

3. What counts as fraud or bribery?

- **Fraud** – any act of deception intended to secure an unfair or unlawful gain (e.g., falsifying invoices, diverting funds, misuse of expense claims).
- **Bribery / Corruption** – offering, giving, receiving, or soliciting anything of value to influence a decision (e.g., cash, gifts, favours).

4. Policy Statements

1. **Zero tolerance.** We will not tolerate fraud or bribery in any form.
2. **No facilitation payments.** Small “grease” payments are prohibited.
3. **Gifts & hospitality.** Only modest, infrequent hospitality that has a clear business purpose is permitted. Anything over USD \$100 must be approved by the COO and declared to the CEO.
4. **Accurate records.** All transactions must be recorded promptly, completely, and truthfully.
5. **Whistle-blower protection.** Anyone who raises a genuine concern in good faith is protected from retaliation.

5. Individual Responsibilities

Role	Key Duties
All staff & volunteers	<ul style="list-style-type: none"> • Act honestly and ethically. • Stay alert for suspicious activity. • Report concerns immediately (see §6).
COO	<ul style="list-style-type: none"> • Reinforce this policy in day-to-day work. • Review expense and procurement documents for red flags. • Support staff who raise concerns. • Ensure staff receive training.
CEO	<ul style="list-style-type: none"> • Oversee investigations and corrective action. • Report material incidents to the Board and funders.
Board	<ul style="list-style-type: none"> • Approve the policy and review it as needed. • Receive confidential updates on all investigations and outcomes.

6. How to Report a Concern

1. **Internal first:** Email jason@ourresearch.org or speak directly to the CEO.
2. **If you feel unable to use internal channels:** Contact the responsible Board Member at risksandcompliance@ourresearch.org.
3. **Emergency / criminal matters:** Call local police and notify the CEO as soon as possible.

Reports can be made anonymously. We will acknowledge receipt within two business days and aim to complete investigations within 30 days.

7. Investigation & Outcomes

- The CEO leads the investigation unless the CEO is implicated or in conflict, in which case the Board leads the investigation.
- Findings are shared with the Board.
- Confirmed fraud or bribery will lead to disciplinary action up to dismissal, recovery of funds, and referral to law-enforcement.

8. Training & Communication

- New hires receive this policy during onboarding.
- The policy is published online

9. Review

This policy is reviewed when laws, funder requirements, or risk profiles change.

Questions? Contact the CEO at jason@ourresearch.org.