



P 9.12 Reporting Fraud, Allegations of Fraud and Misconduct Policy

Reporting Fraud, Allegations of Fraud and Misconduct Policy—P 9.12

It is Creative’s policy to promptly report to appropriate government officials any and all cases of fraud and to ascertain the credibility of any and all allegations of fraud and misconduct, whether the allegations are from known or anonymous sources, deemed credible or not. Creative’s Security Department administers the receipt, review, investigation and proper disposition of all allegations of fraud and misconduct. All allegations shall be promptly reported to the Security Department in the manner set forth in accompanying procedures herein. The Security Department has the exclusive responsibility and authority to: a) report fraud to the appropriate USG authorities, b) at its discretion, define action plans conducive to establishing the credibility of allegations, and c) launch investigations at the request of or in coordination with authorities. All Creative staff are expected to abide by the guidance and support the efforts of the Security Department in handling allegations, reporting fraud and conducting investigations. It is explicitly noted that projects and divisions do not have the authority to independently investigate fraud or allegations, as this is the exclusive domain of the Security Department.

The procedures for implementing Creative’s Reporting Fraud, Allegations of Fraud and Misconduct Policy (P 9.12) are set forth herein.

PR 9.12.1 Fraud and Abuse Orientation and Advertising

Upon arrival, new project employees will receive an orientation by the HQ Security representative, or the HQ Field Operations representative regarding Creative’s Reporting of Fraud, Allegations of Fraud and Misconduct Policy, and will receive information on their responsibilities and how to report allegations. Additionally, Fraud and Misconduct posters will be provided to all project office locations that display how to report allegations of fraud or misconduct. These posters are to be placed in at least one centralized location in each project office, such as the kitchen or copy/printer area.

PR 9.12.2 Reporting Allegations

Any allegation regarding a Creative employee, a sub-contractor, beneficiary or any other relevant party involving violations of law, government regulations or Creative standards of conduct, must immediately be reported to Creative's Fraud & Abuse direct lines: 1-877-750-CREA (2732) or +1-202-772-2137 or via email at Fraud&Abuse. The Security Department administers both the direct line and the email address, and is automatically notified via email when an allegation is made via these methods. Only the Security Department and its designated staff have access to the direct line and email. If allegations are received from other sources, such as Creative's website or general email, they must be immediately reported to the Security Department.

Sensitive to the potential conflicts of interest in the handling allegations, the Security Department will:

- a) Promptly review the allegations and determine whether there are any conflicts of interest inherent in the allegations involving any employees of Creative, including Security Department staff, who would otherwise assist in the review of the allegations;
- b) Engage Creative's Executive Management as deemed necessary; and
- c) Will issue guidance and directives to staff as deemed necessary and appropriate.

PR 9.12.2.1 Reporting to the Office of the Inspector General (OIG)

Once Creative's Security Department conducts a preliminary review of the allegation and determines there is credible evidence showing that a principal, employee, agent or sub-contractor of Creative has committed a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity, a timely disclosure will be made to the OIG and contracting officer in writing. While some field staff has strong relationships with in-country OIGs, any contact with the OIG on behalf of Creative requires advance permission from the Security Department. Each allegation will be handled on a case-by-case basis, and as such, primary contact with the OIG will be determined accordingly.

PR 9.12.3 Protocols during an Inquiry Review

In the event that an allegation requires review either by the OIG or by the Security Department, it is important that certain protocols be followed to ensure protection of Creative assets including employees and information. The Security Department will work with the COP and appropriate HQ Programs Divisions to address the following:

1. Define the working relationship with Creative and the OIG during the review process;
2. Develop plans for the review and discuss how it may or may not impact current project implementation;

3. Develop a statement that can be shared with internal staff as well as external parties including in-country partners and other inquirers (not including the media; all media inquiries will be handled by Creative HQ External Relations);
4. Develop a plan to protect any information that may be used in the review process; and
5. Review current protocols to assess potential vulnerabilities and identify areas for improvement.

Additionally, during an inquiry review, the following specific steps will be taken:

- The President/CEO and Executive Management will be notified of the receipt of any allegations and the intended actions to be followed, via the weekly Allegations Tracker that is sent out each week to Creative's Executive Management staff. Progress regarding each allegation will be recorded via the tracker and sent to Executive Management accordingly.
- Legal Counsel, HR, Field Administration and other Divisions/stakeholders will be consulted as appropriate.
- The Security Department will oversee, guide and work with the field team to conduct an inquiry review, as appropriate.
- Any information that could potentially result in financial liability to Creative will be immediately brought to the attention of the President/CEO, CFO and Contracts Officer so that the client is not improperly billed.
- The Security Department will establish a case file on all allegations received, which will contain support documentation demonstrating the actions taken as a result of an inquiry review. The case file will be held for a minimum of seven years or for a period of time consistent with U.S. Government Records Management Policies governing the disposition of such files.

PR 9.12.4 Protocols if an External Inquiry is received by a Creative Employee or Consultant

If at any point in time during his/her employment with Creative, if an employee or Creative consultant receives an inquiry (of any kind) from the Office of the Inspector General, or any other watchdog/auditory group or individual (i.e. the GAO or any other USG investigative body), this must immediately be reported to the Security Department via Security HQ.
