

# Anti-Fraud & Anti-Money-Laundering Policy

Financial controls · Applies to all staff, volunteers, and suppliers

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## 1. Purpose

Funds entrusted to SORD are intended for crisis-affected communities in Sudan. This policy sets out the controls that protect those funds from fraud, theft, diversion, and money laundering, and the duties of everyone who handles them.

## 2. Zero tolerance

SORD applies zero tolerance to fraud, bribery, kickbacks, facilitation payments, and the diversion of aid. Any staff member, volunteer, or supplier found responsible is removed from SORD work, and the matter is reported to affected funding partners and, where appropriate, to the authorities.

## 3. Financial controls

- **Segregation of duties.** No single person may request, approve, and execute a payment. Approval thresholds escalate with amount.
- **Documented procurement.** Purchases follow written procurement procedures with competing quotations above threshold values; suppliers are screened before engagement.
- **Banking.** Organisational funds are held in the organisation's bank accounts, never personal accounts. Cash handling is minimised, logged, and reconciled.
- **Distribution verification.** Aid distributions are registered, and delivery records with beneficiary counts and field documentation support every program report.
- **Reconciliation.** Accounts are reconciled monthly and expenditure is reported to each funding partner per grant.

## 4. Anti-money-laundering

- SORD accepts funds only from identifiable donors and partner organisations; anonymous large transfers are declined or returned.
- Incoming funds are matched to a named donor or signed grant agreement before use.
- SORD does not make payments to sanctioned individuals or entities, and screens major suppliers and partners against applicable sanctions lists.
- Records of funds received and disbursed are retained for a minimum of seven years.

## 5. Reporting concerns

Suspected fraud or financial irregularity must be reported immediately to management or by email to [info@sord-sudan.org](mailto:info@sord-sudan.org); reports may be made anonymously and whistleblowers are protected from retaliation. Funding partners are informed of confirmed incidents affecting their grants without delay.