

TRIUMF

FINANCIAL FRAUD POLICY

TRIUMF has a policy of zero tolerance to fraudulent and unethical behaviour of any kind that affects TRIUMF in any way.

TRIUMF requires all management, staff, students and visitors to the TRIUMF laboratory, or working for or with TRIUMF at any other site, in Canada or outside of Canada, to act honestly and with integrity, and to be seen to act honestly with integrity, to safeguard the assets and financial resources TRIUMF is responsible for, and to protect TRIUMF's reputation for financial integrity and responsibility.

Fraud is a constant threat and must be a concern to all TRIUMF staff members, students and visitors. It is recognized that fraud may occur internally or externally to TRIUMF, and may be carried out by staff, consultants, suppliers, contractors or other persons or organizations involved with TRIUMF from time to time. It is also recognized that fraud may be carried out individually or in collusion with others.

For purposes of this policy, fraud is defined as:

Theft: Dishonestly appropriating the property of TRIUMF with the intention of permanently depriving TRIUMF of the use of the property.

False Accounting: Dishonestly destroying, defacing, concealing or falsifying any account, record or document required for any accounting purpose, with a view to person gain or gain for another, or with intent to cause loss to another or furnishing information which is, or may be, misleading, false or deceptive.

Bribery and Corruption: The offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by TRIUMF Management or TRIUMF employees.

Deception: Obtaining property or financial advantage by deception and obtaining services or evading financial liability by deception.

TRIUMF is determined to do everything reasonably possible to deter fraud and financially unethical behaviour, and is committed to an Anti-Fraud Policy designed to:

- a.) encourage prevention of fraud and financially unethical behavior
- b.) promote a corporate culture that does not tolerate fraud or financially unethical behaviour
- c.) promote the detection of fraud and financially unethical behaviour
- d.) encourage the reporting of fraud and financially unethical behaviour by providing a confidential and clearly understood mechanism to report fraud.

Responsibilities of the TRIUMF Director and Controller

- a.) to regularly review policies and practices in place to ensure they continue to safeguard TRIUMF against fraud and unethical behaviour.
- b.) to ensure that all staff, students and visitors to TRIUMF are fully aware of TRIUMF's policies regarding fraud.
- c.) to identify fraud risks to operations, systems and procedures, and develop and maintain effective internal controls against fraud.
- d.) to ensure the controls in place to deter and detect fraud are being complied with.
- e.) to carry out vigorous and prompt investigations if allegations of fraud occur.
- f.) to take appropriate legal and disciplinary action against perpetrators of fraud, whomever they might be.

Responsibilities of TRIUMF Staff

- a.) to act ethically and honestly when dealing with TRIUMF assets or other financial resources
- b.) to prevent and detect fraud by complying with TRIUMF's internal control policies and practices
- c.) to be alert to the possibility that unusual events, activities or transactions could be indicators of fraud
- d.) to report all instances of fraud or unethical behaviour through the appropriate channels at TRIUMF
- e.) co-operating fully with whoever is conducting internal reviews or fraud investigations