Financial Crime Controls

Standard Operating Procedure

Global

Owner: Head of Risk, Safety and Integrity

Purpose

This document explains how The Fred Hollows Foundation (The Foundation) receives, handles, and responds to Financial Crime Concerns. It is designed to help anyone who becomes aware of, or suspects, financial crime connected to The Foundation's work understand what to do and what happens after a report is made.

The Foundation takes a zero-tolerance approach to financial crime in its governance, operations, projects, and programs. Financial Crime Concerns include suspected fraud, corruption, bribery, money laundering, terrorism financing, sanctions violations, or any other breach of the Financial Crime Policy.

Our commitment

- take all Financial Crime Concerns seriously
- handle reports confidentially and with restricted access
- escalate concerns promptly to the appropriate decision-makers
- protect reporters from retaliation
- meet all legal, regulatory, and donor reporting obligations
- take appropriate action where wrongdoing is identified

How to Report a Financial Crime Concern

Anyone who becomes aware of, or suspects, financial crime or any breach of the Financial Crime Policy connected to The Foundation must report it immediately.

Reports can be made openly, confidentially, or anonymously. Implementing Partner staff may notify either the Financial Crime Officer directly or their partner relationship manager at The Foundation.

Anonymous complaints: Anonymous complaints are accepted. Please note that anonymity may limit our ability to investigate or respond fully if insufficient information is provided.

Reporting channels:

- Email: speak-up@hollows.org
- Phone: +61 2 8741 1950
- Financial Crime Concern Reporting Form available online, via FredNet, or by emailing speak-up@hollows.org

It is helpful, but not required, to include as much of the following as possible:

- your name, position or relationship to The Foundation, and contact details
- a description of the suspected financial crime
- the location and relevant project or program, if known
- how you became aware of the matter
- the name of any person or organisation suspected of involvement
- the donor funding the relevant project, if known
- any supporting evidence, such as documents or photographs
- whether the matter has been reported to anyone else internally or externally

You do not need proof to raise a concern, but reports should be made honestly and in good faith.

What Happens Next

#	Stage	What this means for you
1	**Received & acknowledged**	Your report will be logged securely with access restricted to authorised personnel only. The Financial Crime Officer will acknowledge receipt within **24 hours**.
2	**Internal escalation**	The Financial Crime Officer will notify the CEO, Chief Integrity Officer, and General Counsel on the same day the concern is received. If the allegation concerns the CEO, it will be escalated to the Chair of the Board.
3	**Assessment & triage**	The concern will be assessed to determine its nature and urgency, whether immediate action is required (including possible suspension), applicable legal and donor reporting obligations, and the appropriate investigation pathway. Donor notification: for DFAT-funded activities, the relevant donor will be notified within **5 working days**. Other donor notification requirements are checked case by case.
4	**Investigation**	An investigation will be conducted by authorised personnel which may include an external investigator or specialist, in a fair, confidential, and evidence-based manner. Where the alleged incident may be a breach of law, it will be referred to the relevant authorities.
5	**Outcome & closure**	Relevant stakeholders will be informed of the result. The concern will be recorded in The Foundation's registers and included in Board reporting. The matter will be formally closed once all required actions are completed.

Possible Outcomes

Following assessment and investigation, The Foundation may:

- take corrective or disciplinary action against the individual or organisation involved
- terminate an employment, engagement, or partnership arrangement
- refer the matter to the relevant authorities where a breach of law is suspected
- implement changes to controls, processes, or practices
- find that the concern cannot be substantiated and take no further action

Confidentiality and Protection

All information obtained under this SOP is treated confidentially. Information is shared only with those who need it to assess, manage, investigate, escalate, or close the matter.

Anyone who raises a Financial Crime Concern in good faith is protected from retaliation, adverse treatment, intimidation, harassment, or discrimination. The Foundation does not tolerate any form of detriment against people who speak up or assist with an investigation.

If you have concerns about retaliation or a breach of confidentiality, please escalate through speak-up@hollows.org.

More Information

For further information, please refer to the documents below on our FHF website:

- Financial Crime Policy
- Financial Crime Controls Manual
- Speak Up Policy
- Whistleblowing Complaint SOP
- Privacy Policy

Questions? Contact speak-up@hollows.org or call +61 2 8741 1950.

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