GOVERNANCE, FINANCIAL STEWARDSHIP & ACCOUNTABILITY

Anti-Fraud, Financial Misconduct and Whistleblower Policy - Public Version

Sahan's Board-approved public policy on prevention, reporting, protection and accountability.

Approved by	Board of Directors
Approval date	July 10, 2026
Effective date	July 10, 2026
Policy status	Board approved
Review cycle	At least annually, or sooner if legal, operational or funding requirements change.

Purpose

This public policy states Sahan Community Network's commitment to preventing and addressing fraud, theft, bribery, misuse of funds, falsified records, undisclosed conflicts of interest, serious financial-control breaches and retaliation against good-faith reporters.

Scope

This policy applies to directors, officers, employees, contractors, volunteers and other persons acting for Sahan. It also guides how Sahan receives concerns from funders, partners, service users and members of the public concerning Sahan funds, property, records, grants, payroll, procurement or financial representations.

Prohibited conduct

- Taking, using or directing Sahan money, equipment, information or property without authorization.
- Creating, altering, concealing or destroying invoices, receipts, timesheets, payroll records, bank records, grant claims, reports or approvals.
- Submitting duplicate, inflated, personal or ineligible expenses.
- Offering, requesting or accepting a bribe, kickback, secret commission or benefit intended to influence a decision.
- Using grant or restricted funds for an unauthorized purpose or knowingly making a false statement to a funder, regulator, insurer, donor or the Board.
- Concealing a personal, family or financial interest in a transaction or decision.
- Impersonation, phishing, unauthorized account access, payment-redirection fraud or deliberate circumvention of financial controls.

- Retaliating against a person who raises a concern in good faith or participates in an authorized review.

Good-faith reporting

A report is made in good faith when the person honestly believes the information may show misconduct. The report remains protected even when a review does not confirm the concern. A knowingly false or malicious accusation is not a good-faith report.

People acting for Sahan must report suspected financial misconduct promptly. They should preserve relevant records and avoid confronting the subject, conducting an unauthorized investigation or discussing the allegation more widely than necessary.

How to raise a concern

A concern may be raised directly with the Chair of the Board. If the concern involves the Chair, it may be raised with another disinterested member of the Board. A staff member who receives a concern must direct it promptly to an appropriate, conflict-free Board representative.

A community member, funder, partner or other person may contact Sahan to arrange a private conversation with an appropriate Board representative.

> **Privacy notice:** Do not submit detailed allegations, financial records, passwords or sensitive personal information through Sahan's general website contact form. Contact Sahan first to arrange a direct and confidential reporting method.

Protection from retaliation

Sahan prohibits retaliation against anyone who makes a good-faith report, participates in an authorized review or refuses to participate in misconduct. Retaliation includes threats, harassment, dismissal, reduced hours, exclusion, adverse assignments or another disadvantage connected to the report or participation. A retaliation concern will be addressed as a separate policy violation.

Confidentiality and privacy

Information is shared only with people who need it to assess the concern, protect funds or records, obtain advice, conduct an authorized review, take corrective action or meet legal, insurance and funding obligations.

Sahan cannot promise absolute secrecy. Limited disclosure may be required for fairness, legal compliance, funder notification, insurance, recovery of losses or referral to an appropriate authority. Records concerning a report are stored securely and access is restricted.

Fair and conflict-free review

An allegation is not treated as proof. Concerns are assessed through a proportionate and impartial process. Anyone implicated in, benefiting from or personally connected to the matter must disclose the conflict and take no part in handling or deciding it.

A disinterested Board representative oversees the response. The Board may obtain independent accounting, legal, investigative, information-security or other professional assistance when the circumstances require it.

The person affected by a possible adverse finding is given a fair opportunity to respond, subject to any immediate legal or protective measures that may be required. Decisions are based on the available evidence and applicable legal, contractual and funding requirements.

Protecting records and organizational assets

Relevant paper and electronic records must be preserved. No person may alter, delete, conceal, fabricate or destroy evidence, intimidate witnesses, interfere with an authorized review or obstruct access to records that Sahan is legally entitled to examine.

Sahan may take proportionate interim steps to protect funds, records, equipment, systems or people while a concern is assessed. An interim safeguard is not a finding of misconduct.

Corrective and external action

Where misconduct or a serious control failure is established, Sahan may strengthen controls, correct records, seek repayment or recovery, provide training, impose appropriate employment or contractual consequences, notify a funder or insurer, obtain legal advice or refer the matter to a regulator, police service or other authority.

Sahan will make an external report when required by law, a funding agreement, an insurance obligation or a lawful direction. Public statements concerning an allegation or review must be authorized by the Board and must protect privacy and procedural fairness.

Records, monitoring and review

Reports, conflict assessments, decisions and corrective actions are documented and retained securely for the period required by law, funding terms, insurance obligations or professional advice.

The Board reviews this policy, its reporting channels and related financial-control risks at least annually and after any significant incident or material control change.

Public contact

To arrange a confidential conversation about a financial concern, contact Sahan Community Network at info@sahancommunity.com or 416-668-9156. Office hours are Monday to Saturday, 10:00 a.m. to 6:00 p.m. Do not include detailed allegations or sensitive records in the first email or website message. Ask to be connected with an appropriate Board representative.

> This policy was formally adopted by the Board of Directors of Sahan Community Network and remains subject to regular Board review.