
**AFRICA CENTRES FOR DISEASE CONTROL AND PREVENTION
ANTI-FRAUD AND CORRUPTION POLICY**

Prepared By	Reviewed By	Approved By
Office of Internal Oversight	Senior Management Team	Director General



1. INTRODUCTION

This Anti-Fraud and Corruption Policy (“the Policy”) establishes the framework for preventing, detecting, and addressing fraud and corruption within the Africa Centres for Disease Control and Prevention (Africa CDC). It underscores Africa CDC’s commitment to integrity, transparency, and accountability, in line with African Union (AU) rules regulations and policies; and international best practices.

Fraudulent, corrupt, and/or collusive practices undermine Africa CDC’s mission, deplete resources, and erode stakeholder trust. Africa CDC is committed to robust prevention, detection, and response measures, in line with AU and international standards. Africa CDC is committed to preventing and responding robustly to:

- 1.1 Fraud and corruption by staff.
- 1.2 Fraud perpetrated against Africa CDC by partners, suppliers, or third parties.
- 1.3 Collusive practices involving any other parties.

To support its 2023–2027 Strategic Plan, Africa CDC promotes transparency and accountability in resource management. This Policy aims to prevent fraud and corruption through strong internal controls, staff training and awareness, and effective auditing.

The Policy reflects the principles of the African Union Anti-Fraud and Corruption Policy, the AU Convention on Preventing and Combating Corruption, and is consistent with relevant internal and international regulations and codes of conduct.

2. OBJECTIVES

The objectives of this Policy are to:

- 2.1 Prevent, identify, and address fraudulent and corrupt activities within Africa CDC.
- 2.2 Promote a culture of integrity and ethical behavior in public health governance.
- 2.3 Provide guidance on the detection and reporting of fraud and corruption.
- 2.4 Outline disciplinary measures for fraudulent and corrupt practices.
- 2.5 Regularly review and update anti-fraud and corruption measures to adapt to emerging risks and ensure continuous improvement.

3. SCOPE

This Policy applies to all covered persons and entities regardless of their location, and governs Africa CDC activities, transactions, and partnerships both within and outside Africa, including international collaborations, in accordance with relevant international laws and agreements. Included are:

- 3.1 All Africa CDC employees (including temporary staff, interns, and volunteers) consultants, contractors, and board members.
- 3.2 Partner organizations, including donors, vendors, and implementing agencies.



3.3 All financial transactions, procurement processes, research initiatives, and international collaborations.

4. DEFINITIONS

4.1 Abuse: Abuse means waste or improper use of the assets of Africa CDC or African Union financed or supported activity, either committed intentionally or through reckless disregard.

4.2 Bribery: This is the act of offering, giving, receiving, or soliciting anything of value to influence decisions within Africa CDC's programs or policies.

4.3 Conflict of Interest: A situation where personal interests interfere with professional responsibilities, affecting the impartial execution of Africa CDC's mandates.

4.4 Corruption: Is the act of offering, giving, receiving or soliciting, directly or indirectly, or attempts to do so, of anything of value to influence improperly the actions of another party. The person or contractor of an entity acts contrary to the interests of the entity and abuses his/her position of trust to achieve some personal gain or advantage for themselves or for another person/entity. The abuse of entrusted power for private gain, including bribery, extortion, nepotism, and conflicts of interest.

4.5 Collusive practice is an arrangement among two or more parties to achieve an improper purpose such as price-fixing or bid rigging.

4.6 Embezzlement: The misappropriation of Africa CDC funds or assets for personal use.

4.7 Evidence: means any physical object, record, document (in any form), testimony, or other information that tends to establish the existence or non-existence of an allegation or fact.

4.8 False or malicious allegations means allegations that are knowingly, deliberately or recklessly inaccurate or misleading, to gain some competitive advantage or cause harm to a person or entity.

4.9 Fraud: Any intentional act of deception, misrepresentation, or concealment intended to secure an unfair or unlawful gain, including misrepresentation of public health data or misuse of donor funds. Fraud is a dishonest activity causing actual or potential financial loss to any other person, entity including theft of money or other property by employees or persons external to the entity and whether deception is used at the time, immediately before or immediately following the activity.



4.10 Fraudulent practice is any act or omission, including any misrepresentation that knowingly misleads, or attempts to mislead, a party to obtain any financial or other benefit or to avoid any obligation.

4.11 Integrity violation is any act which violates Africa CDC's Fraud and Anticorruption policy and includes, abuse, coercion, collusion, conflict of interest, corruption, and fraud, as defined herein.

4.12 Obstructive practice is (i) deliberately destroying, falsifying, altering or concealing of evidence material to the investigation or making false statements to investigators in order to materially impede an investigation into allegations of a corrupt, fraudulent, coercive or collusive practice; and/or threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to the investigation or from pursuing the investigation, or (ii) acts intended to materially impede the exercise of contractual rights of audit or access to information.

4.13 Retaliation is misconduct and is any detrimental act, direct or indirect, recommended, threatened or taken against a whistleblower or witness or person associated with a whistleblower or witness in a manner material to the complaint because of the report or cooperation with an Africa CDC investigation by the whistleblower or witness. It includes but is not limited to harassment, discriminatory treatment, assignment of work outside the corresponding job description, inappropriate performance appraisals or salary adjustments, or the withholding of an entitlement. As retaliation constitutes misconduct, those engaged in retaliation are subject to the disciplinary committee as provided in the Staff rules and Regulations.

5. ROLES AND RESPONSIBILITIES

5.1 Employees and Non-Staff employees: Report suspected fraud or corruption promptly to their department head. If confidentiality is desired, they may report directly to the Office of Internal Audit.

5.2 Department Heads: Upon receiving a report, must promptly escalate the matter to the Head of Internal Oversight (OIO).

5.3 Contractors, Consultants, Partners and Stakeholders: Report concerns through established channels, including the Africa CDC anonymous online form, hotlines, or directly to the Internal Oversight Division or Office of Internal Audit.

5.4 Internal Audit and Compliance Teams: Receive and review reports, conduct investigations, and/or may coordinate to get the services of external investigators.



6. PREVENTION MEASURES

6.1 Ethical Culture

Africa CDC is committed to fostering a culture of integrity and accountability, promoting a zero-tolerance stance against fraud and corruption. Regular training and capacity-building initiatives will be conducted to ensure all staff members, including contractors and partners, understand the ethical standards expected of them. The Internal Oversight Division plays a critical role in monitoring compliance, providing guidance, and investigating potential violations. Additionally, awareness campaigns will be carried out to continually reinforce the importance of ethical behavior, integrity, and transparency in all organizational activities.

6.2 Due Diligence

Before engaging with employees, vendors, and partners, Africa CDC will conduct comprehensive background checks to assess their credibility, integrity, and history concerning fraudulent activities. This process includes verifying references, reviewing past business dealings, and analyzing financial records where applicable. Due diligence also extends to ongoing monitoring to ensure continued compliance and integrity throughout the duration of the relationship. The organization prioritizes working with entities and individuals that demonstrate a strong commitment to ethical standards and compliance.

6.3 Internal Controls

Africa CDC implements robust and effective internal controls to detect, prevent, and address fraudulent and corrupt practices. These controls include a system of checks and balances, segregation of duties, and regular audits of financial transactions and operational processes. Stringent approval processes are applied to financial disbursements, procurement, and contractual agreements. Regular risk assessments will be carried out to identify vulnerabilities, followed by implementing mitigation strategies to strengthen the control environment.

6.4 Whistleblower Protection

Africa CDC has established secure and confidential reporting mechanisms to encourage employees, partners, and stakeholders to report instances of suspected fraud, corruption, or unethical behavior without fear of retaliation. Reports can be made anonymously through hotlines, email, or dedicated online platforms managed by the Internal Oversight Division. Strict measures are in place to protect whistleblowers against retaliation, discrimination, or victimization, ensuring that all reports are treated with the highest level of confidentiality and investigated promptly and impartially.

7. DETECTION AND REPORTING

Africa CDC is committed to maintaining a proactive approach to detecting and addressing fraud and corruption. All personnel, including employees, contractors, consultants,

partners, and stakeholders, share the responsibility of identifying and reporting any suspected fraudulent or corrupt practices.

7.1 Reporting Mechanisms

Any suspected fraud or corruption within Africa CDC must be reported immediately through established and secure reporting channels. These include:

- 7.1.1 **Online Reporting:** This includes a dedicated anonymous form on the Africa CDC website for confidential reporting.
- 7.1.2 **Hotlines:** This includes dedicated telephone lines available for confidential reporting.
- 7.1.3 **Emails:** These are secure email addresses managed by the Compliance and Internal Oversight Divisions.
- 7.1.4 **Direct Reporting:** This includes in-person reporting to designated Compliance Officers or members of the Internal Oversight Division.

Reporting mechanisms are accessible, confidential, and designed to ensure that anyone reporting suspected fraud can do so without fear of retaliation. Africa CDC actively encourages a culture where concerns about integrity and ethics can be openly raised.

7.2 Reporting Procedures

All persons to whom this Policy applies shall report promptly any action or practice that is or may be in breach of this Policy, or any attempts thereof, in accordance with the procedures outlined in this Policy. Each Africa CDC staff member and non-staff employee is required to report promptly any reasonably suspected case of any fraudulent, corrupt and/or collusive practices, or any related attempts at such practices, to his/her department head or to the Office of internal Audit or Legal Office if confidentiality is desired. All department heads shall report any such cases promptly to the Head - Office of Internal Oversight.

Any person who reports reasonably held suspicions of fraud or corruption, or who cooperates in such investigations, shall not be subject to recrimination or victimization. Victimization or any attempts to deter anyone from reporting suspicions of fraud or corruption or from witnessing such acts in an investigation constitute a serious breach of the Code of conduct and may result in the imposition of disciplinary measures in accordance with Staff Regulation Rules and Regulations.

7.3 Confidentiality and Protection Against Retaliation

Africa CDC guarantees that all reports of suspected fraud or corruption will be handled with the utmost confidentiality. The identity of the whistleblower will be protected to the fullest extent possible, and no individual who, in good faith, reports misconduct will face retaliation, harassment, or victimization. Retaliation against whistleblowers is strictly prohibited, and any act of reprisal will be subject to disciplinary measures.

Staff members, consultants, experts, external collaborators, interns, contractors, suppliers, cooperating parties and any third parties who have reported suspicions of fraud



or corruption shall not discuss the matter with anyone other than the person to whom the report is made or as otherwise directed. Africa CDC shall take all appropriate measures to ensure that the information reported is disclosed only to the people handling the investigation and remains strictly confidential.

Africa CDC shall keep secret the identity of the person(s) reporting in good faith any suspicion of fraud and corruption and shall protect them from any form of reprisal in cases of reasonable fear of adverse reaction from the person whom they reasonably suspect of having committed a fraudulent act or from a superior. In cases where the person reporting the incident is required to provide evidence, his/her identity shall be kept secret except as required by any legal proceedings.

7.4 Investigation Process

All reports of suspected corruption and fraud shall be registered and filed for investigation which will be followed by a preliminary evaluation of the report and prioritization of the reports.

The Office of Internal Oversight – Internal Audit unit is primarily responsible for the investigation function within Africa CDC unless a dedicated Investigative function is established within structures of the Africa CDC. All allegations of fraud will be reviewed by the OIO. In addition, OIO may undertake proactive investigations in high-risk areas that are susceptible to fraud and corruption. Where a matter is appropriate for an OIO investigation, the case will be assigned to an investigator who will conduct an objective investigation of all available facts. This will include the collection and review of all relevant documents, interviews of people who can provide information, and an interview with those alleged to be involved in fraud. OIA may also coordinate with other fraud investigation offices, as appropriate, to ensure the effective investigation of fraud involving more than one organization, or where perpetrators external to the Africa CDC are allegedly involved. The process includes:

- 7.4.1 **Preliminary Assessment:** An initial evaluation to determine the credibility of the report and assess the appropriate course of action.
- 7.4.2 **Formal Investigation:** If necessary, a comprehensive and objective investigation will be conducted to gather evidence, interview witnesses, and analyze relevant documentation.
- 7.4.3 **Reporting and Resolution:** The findings of the investigation will be documented, and recommendations will be made for corrective action, disciplinary measures, or legal proceedings if applicable.
- 7.4.4 **Feedback:** Whistleblowers may receive feedback on the progress and outcome of their reports, where appropriate, while ensuring confidentiality.

7.5 False Reporting

Africa CDC takes false and malicious reporting seriously. Any individual found to have intentionally submitted a false report will be subject to disciplinary action, including possible termination or legal proceedings.



Proven abuse of the process by making knowingly false, vexatious or malicious allegations shall be regarded as a serious breach of the Code of Conduct for staff and may also result in the imposition of disciplinary measures in accordance with Staff Regulation Rules and Regulations.

OIO shall recommend that appropriate administrative, legal and/or disciplinary action be taken against any person or entity that is found to have violated this Policy. Any such recommendation shall be included in a Final Report issued to management or the competent authorities, in accordance with the OIA Investigation Procedures, the Uniform Guidelines for Investigations and any Investigation protocols that may be subsequently developed and adopted by Africa CDC.

By maintaining a transparent and secure reporting system, Africa CDC reinforces its commitment to ethical behavior, accountability, and the prevention of fraud and corruption.

8. RESPONSE AND DISCIPLINARY ACTIONS

Africa CDC is committed to taking decisive and appropriate actions in response to confirmed instances of fraud or corruption. Such measures are essential to maintaining the integrity and credibility of the organization while deterring future misconduct.

8.1 *Disciplinary Actions*

Upon confirmation of fraud or corruption through a thorough investigation, Africa CDC will implement appropriate disciplinary measures according to AU policy, which may include:

- 8.1.1 **Termination of Employment:** Immediate dismissal of employees found guilty of fraudulent or corrupt activities, in accordance with the organization's employment policies and applicable labor laws.
- 8.1.2 **Contract Cancellation:** Termination of contracts with vendors, partners, or consultants involved in fraudulent or corrupt acts. This may include disqualification from future engagements with Africa CDC.
- 8.1.3 **Legal Proceedings:** Where necessary, Africa CDC will initiate legal proceedings to recover losses incurred due to fraudulent or corrupt practices. Civil or criminal charges may be pursued based on the severity of the offense.

8.2 *Involvement of Law Enforcement*

In cases where the nature of the fraud or corruption violates national or international laws, Office of Internal Oversight will refer to and coordinate with the Africa CDC Department of Legal Affairs and Dispute Settlement. This may involve sharing evidence, collaborating in investigations, and supporting legal action to ensure accountability.

In addition, any reported cases involving criminal activity may be referred to the relevant local law enforcement authorities. Any such referral shall be made following consultation with the Africa CDC Legal Counsel and the approval of the Director General. Africa CDC

shall seek recovery of its funds and/or property using all means at its disposal, including through legal action.

8.3 Addressing Control Weaknesses

After any confirmed case of fraud or corruption, Africa CDC will conduct a comprehensive review to identify and address any control weaknesses that may have contributed to the incident. The OIO shall conduct a review of relevant policies, procedures and internal controls in the area where the fraud or corruption occurred to assess whether they need to be revised and what, if any, corrective measures need to be taken. Corrective measures may include:

- 8.3.1 Strengthening internal controls and oversight mechanisms.
- 8.3.2 Enhancing monitoring processes and compliance checks.
- 8.3.3 Updating policies, procedures, and protocols to mitigate future risks.
- 8.3.4 Providing additional training to staff to address identified vulnerabilities.

9. TRAINING AND AWARENESS

Africa CDC recognizes that preventing fraud and corruption begins with a well-informed and vigilant workforce. To this end, the organization emphasizes continuous education, awareness, and training on ethical conduct and compliance. Africa CDC shall develop and conduct a training and disclosure program aimed at increasing awareness of the risks of fraudulent, corrupt and/or collusive practices; and developing skills for understanding, detecting, preventing and reporting such practices. Participation in such program shall be mandatory for all staff members and non-staff employees. In addition, Africa CDC shall implement ongoing employee training tailored to specific positions, with the aim of enabling such employees to detect, prevent and promptly report any practices that are contrary to this Policy.

9.1 Training Initiatives

- 9.1.1 **Periodic Training Sessions:** All employees, including contractors and consultants, will participate in periodic training programs covering topics such as fraud and corruption risks, red flags to watch for, and proper reporting channels
- 9.1.2 **Specialized Training:** Targeted training sessions for high-risk departments, including finance, procurement, and human resources, to reinforce their understanding of fraud prevention measures and ethical standards.
- 9.1.3 **Induction Programs:** New employees will receive mandatory training on Africa CDC's Anti-Fraud and Corruption Policy, ensuring they understand their roles and responsibilities from the outset.

9.2 Awareness Campaigns

- 9.2.1 **Internal Communications:** Regular communication through emails, newsletters, posters, and digital platforms to keep employees informed about ethical standards, policy updates, and reporting mechanisms.



9.2.2 **Workshops and Seminars:** Hosting workshops and seminars to discuss real-world scenarios, share best practices, and promote a culture of transparency and accountability.

9.2.3 **Ethics Week:** An annual "Ethics Week" dedicated to reinforcing the importance of integrity, transparency, and ethical decision-making.

10. POLICY REVIEW AND MONITORING

To ensure continued relevance and effectiveness, Africa CDC is committed to regularly reviewing and monitoring the Anti-Fraud and Corruption Policy.

10.1 *Periodic Review*

The Policy will be reviewed periodically, at least every two years or more frequently if significant changes in the operational environment occur.

Reviews will consider feedback from employees, stakeholders, and compliance officers, as well as findings from internal audits, risk assessments, and investigations.

Any updates or amendments to the Policy will be communicated promptly to all employees and stakeholders.

10.2 *Monitoring Compliance*

Internal Audits: Regular audits conducted by the Internal Oversight Division to evaluate adherence to this Policy, assess the effectiveness of control measures, and identify areas for improvement.

Risk Assessments: Periodic risk assessments to identify emerging fraud risks and adapt preventive measures accordingly.

Feedback Mechanisms: Soliciting feedback from employees, partners, and stakeholders to gauge the effectiveness of training programs, reporting mechanisms, and overall policy awareness.

By maintaining a rigorous approach to policy review, training, and compliance monitoring, Africa CDC demonstrates its ongoing commitment to preventing fraud and corruption and upholding the highest standards of integrity.

11. CONCLUSION

Africa CDC is committed to maintaining the highest standards of integrity and ethical conduct. This Policy underscores our dedication to preventing and addressing fraud and corruption in all aspects of our operations, ensuring that public health initiatives are managed transparently and effectively.



Adopted on: [Date]

Signed:

Dr. Jean Kaseya (on behalf)
Director General
Africa CDC
Chairman Internal Oversight Management Committee

Signed by:

06DD3AD10C2741A...

Dr. Claudes Kamenga

Chief of staff

Feb 17, 2026 | 20:20 EAT