

Gender Education, Empowerment & Leadership Organization (GEELO)



Anti-Fraud & Anti-Corruption Policy

1. Introduction and Purpose

At the Gender Education, Empowerment & Leadership Organization (GEELO), our mission is to establish a culture where women and children are supported to achieve their full potential. To protect the integrity of our work and the trust placed in us by the communities we serve and our international partners, we maintain a zero-tolerance stance toward fraud and corruption. This policy is designed to protect GEELO's assets, reputation, and the resources entrusted to us, ensuring that every dollar and resource reaches the vulnerable women, children, and youth who need it most. We provide clear guidelines for all staff, volunteers, and partners on identifying and reporting unethical behavior.

2. Our Core Values in Action

Our commitment to this policy is rooted in our core values of Integrity and Credibility, where we act honestly and transparently in all our activities. We uphold Transparency & Accountability by remaining answerable to our stakeholders through timely feedback and open processes. Furthermore, we emphasize Respect by honoring the values and cultures of our stakeholders while maintaining the highest ethical standards.

3. Scope of the Policy

This policy applies to everyone associated with GEELO, including the Board of Directors, Founding Members, and Management (CEO, Program Managers, Field Coordinators). It also extends to all staff members, volunteers, interns, contractors, consultants, and partner organizations.

4. Defining Fraud and Corruption

GEELO defines prohibited acts as follows:

Term	Definition	Examples
Fraud	Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.	Falsifying expense claims, inflating invoices, or diverting aid.
Corruption	The abuse of entrusted power for private gain.	Bribery, kickbacks, nepotism, and extortion.
Conflict of Interest	Situations where personal interests could improperly influence the performance of official duties.	Awarding contracts to family members or friends without a fair process.

5. Prevention and Risk Management

GEELO takes proactive steps to prevent fraud and corruption through robust financial controls and a culture of accountability. We maintain a financial system with "segregation of duties" to ensure no single person has total control over a financial transaction. Our recruitment process includes thorough background checks for all new staff and volunteers. All purchasing follows a transparent, competitive process as overseen by the Board and Management. Additionally, regular awareness sessions are held to help staff recognize "red flags" of fraudulent activity.

6. Reporting Procedures (Whistleblowing)

We encourage a culture of openness and believe that if you suspect fraud or corruption, you have a duty to report it. Reports should be made to the Finance Controller or the Program Manager. If the report involves senior management, it should be directed to the Executive Director or the Board of Directors. GEELO guarantees that all reports will be treated with the strictest confidentiality and strictly prohibits any form of retaliation against individuals who report concerns in good faith.

7. Investigation and Sanctions

All reports will be promptly and thoroughly investigated by an independent team appointed by the Board. Any individual found to have engaged in fraud or corruption will face disciplinary action, which may include immediate termination of employment or contract, legal action and reporting to local authorities in Kenya or Somalia, and the recovery of lost assets or funds.

8. Monitoring and Review

The Board of Directors is responsible for the oversight of this policy. It will be reviewed annually to ensure it remains effective and aligned with international best practices and donor requirements, including UN and international NGO standards.

Approved by:

Zahra Mohamed Abtidon

Executive Director, GELO

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