



United Nations Joint Staff Pension Fund

Investment Management Division

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Anti-Fraud and Anti-Corruption Policy

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Preamble

The Investment Management Division of the United Nations Joint Staff Pension Fund (IMD) has instituted this Anti-Fraud and Anti-Corruption Policy as it recognizes that strong ethics policies and supporting procedures are necessary to promote an ethical institutional culture and ensure that IMD professionals conduct themselves with the utmost degree of integrity.

The principles expressed in this Anti-Fraud Policy, as well as in IMD's Personal Securities Trading, Gift and Hospitality, Mandatory Leave, and Communications and Document Retention policies, reinforce IMD's commitment to the highest standards of ethics, good governance, competence, and trustworthiness and reflect IMD's objective to maintain the highest standards of efficiency, competence, and integrity expected of UN Staff. This Policy will permeate all aspects of IMD's activities and will serve as an umbrella to the more specific guidelines and controls found in IMD's Investment Policy Statement, Investment Procedures, and Risk Management manuals. This Policy applies to all IMD Staff and is consistent with the United Nations Secretariat Anti-Fraud and Anti-Corruption Framework as well as UN Resolutions against fraud and corruption including but not limited to: 55/61, 56/186, and 57/244 and the UN Convention against Corruption.

Scope of Policy

This policy applies to any irregularity, or suspected irregularity, involving IMD Staff as well as consultants, advisors, vendors, contractors, outside agencies doing business with IMD, Staff of such agencies, and/or any other parties with a business relationship with IMD.

Any investigative activity required will be conducted regardless of the suspected wrongdoer's length of service, position/title, or relationship to the Fund.

IMD Management is responsible for the prevention and detection of fraud, corruption, and/or other irregularities.

Definitions

Fraud is defined as any act or omission, deceitful practice or willful device, intended to misrepresent or conceal a material fact. Fraud may result in an undue benefit for oneself or a third party. Fraud may cause another to act to his or her detriment, to deprive another of his right, or in some manner to do him an injury.

Presumptive Fraud is defined as a conclusion made to the existence or nonexistence of a fact / deception that must be drawn from other evidence that is admitted and proven to be true.

Corruption is defined as a form of dishonest or unethical conduct by a person entrusted with a position of authority, including acts or omissions that misuse official authority, or seek to influence the misuse of official authority in order to obtain an undue benefit for oneself or a third party.

Irregularities are defined as all of the other improper or unethical acts, omissions, or wrongdoing not falling into the two categories of fraud and corruption. Irregularities may be detrimental to the organization or another individual and may result in an undue benefit to the wrongdoer. Each member of the IMD management team should be familiar with the types of improprieties that could occur within his or her area of responsibility, and they should be alert for any indication of irregularity.

Types of Fraud and Presumptive Fraud

Fraud or presumptive fraud may include, but not be limited to, the following:

- Any dishonest or fraudulent act;
- Any fraud attempt;
- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Use of ICT systems for fraudulent purposes;
- Unauthorized cash transferred from the Fund to an account or party which is external to the Fund;
- Collusion with parties including, but not limited to, vendors and counterparties;
- Receiving bribes or kickbacks;
- Intentional misrepresentation of data related to the Fund's performance and/or financial statements;
- Entitlement fraud;
- Forgery;
- Insider trading – i.e., trading based on material nonpublic information;
- Front running – i.e., the act of entering a securities transaction, either with a long or short position, knowing that other investors are about to take a position that will positively influence one's own;
- Market manipulation – a deliberate attempt to interfere with the free and fair operation of the market and create artificial, false or misleading appearances with respect to the price of, or market for, a security, commodity or currency.

If there is any question as to whether an action constitutes fraud or presumptive fraud, contact the IMD Chief Compliance Officer for guidance.

Confidentiality

The IMD Chief Compliance Officer treats all information received pursuant to this policy confidentially. Any IMD Staff who suspects dishonest or fraudulent activity should notify the IMD Chief Compliance Officer immediately, and should not attempt to personally conduct an investigation related to any suspected fraudulent act (see the Reporting Procedure section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a need to know i.e., those individuals for whom certain facts are essential for the proper performance of their duties. This is important in order to avoid potentially damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct.

Reporting and Escalating

Any fraud, corruption and/or irregularity that is detected or suspected must be reported immediately to the IMD Chief Compliance Officer including matters of concern. IMD Management and IMD Staff also have the discretion to report matters directly to OIOS, as described in the OIOS website.

For any presumptive, fraudulent, corrupt and/or irregular activity, the IMD Chief Compliance Officer should conduct a fact-finding assessment to determine whether or not the matter merits referral to the OIOS Investigation Division.

The Chief Compliance Officer should inform the Representative of the Secretary-General for the investment of the assets of the UNJSPF of matters meriting investigation. The IMD Chief Compliance Officer should escalate matters that merit investigation to the Office of Internal Oversight Services' (OIOS) Investigative Division and escalate to the Office of the Secretary-General if no action or measure is taken.

The Office of Internal Oversight Services' (OIOS) Investigative Division should coordinate investigations with the Chief Compliance Officer, as appropriate. Investigations should follow OIOS the procedures which are identified in the OIOS Manual. Investigations will be reported to the United Nations Joint Staff Pension Board (UNJSPFB) through the Audit Committee.

If the investigation substantiates that fraudulent activities have occurred, the IMD Chief Compliance Officer will issue reports to appropriate designated personnel and to the United Nations Joint Staff Pension Board through the Audit Committee.

Decisions to prosecute will be made in accordance with relevant United Nations Regulations and Rules.

Investigation Conduct

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way. The IMD Staff member or other complainant may remain anonymous.

All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the OIOS Investigations Division. No information concerning the status of an investigation will be given out. The proper response to any inquiries is, "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the OIOS Investigations Division.
- Individuals who believe that retaliatory action has been taken against them because they have reported misconduct or cooperated with a duly authorized audit or investigation should forward all information and documentation available to them to support their complaint to the UN Ethics Office as soon as possible. Complaints may be made in person, by regular mail or by e-mail, by fax or through the Ethics Office helpline.

Outcome

Based on the OIOS Investigation Division examination a recommendation by the Office of Human Resources Management (OHRM) will be provided to the Representative of the Secretary-General for the Investment of the Assets of the Fund. Any outcome including, but not limited to termination or sanction should be coordinated with OHRM. The Office of the Secretary-General and/or the United Nations Joint Staff Pension Board will be informed when deemed appropriate.

The policy will be periodically reviewed and updated as needed.

Approved by

Carol Boykin, CFA
Representative of the Secretary General
United Nations Joint Staff Pension Fund

Date: 1 November 2016