**APPENDIX F3: Sample Fraud Policy RESPONSIBILITY Matrix**

*This sample matrix can be used as a tool to summarize and visualize the fraud risk governance responsibilities that have been defined for the organization. Entries shown are for example only.*

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Action Required | Board | Exec  Mgmt. | Mid / Line  Mgmt. | Risk  Mgmt. | Legal | Internal Audit | Fin/  Acctg. | FIU\*/ Corp. Security | HR / Employee Relations | PR | IT | BU\*\*/ Line Personnel |
| 1. Fraud Risk Management Oversight | P |  |  |  |  |  |  |  |  |  |  |  |
| 1. Code of Conduct / Fraud Control Policy |  | P |  |  |  |  |  |  |  |  |  |  |
| 1. Fraud Prevention Controls (Process Level) |  | P | SR | S | S | S | S | S | S | S | S | S |
| 1. Fraud Risk Assessment |  | P | S | S | S | S | S | S | S | S | S | S |
| 1. Fraud Detection Controls (Process Level) |  | P | SR | S | S | S | S | S | S | S | S | S |
| 1. Fraud Education / Training and Awareness |  | S |  |  | S | S |  | P | SR |  |  |  |
| 1. Hotline / Ethics Line |  |  |  |  | P | S |  | S | S |  |  |  |
| 1. Reporting of Concerns / Complaints / Violations | SR | SR | SR | SR | SR | SR | SR | SR | SR | SR | SR | SR |
| 1. Evaluation of Reported Incidents |  |  |  |  | P | S |  | SR | S |  | S |  |
| 1. Fraud / Misconduct Investigations | S |  |  |  | SR | S |  | P | S |  | S |  |
| 1. Whistleblower Follow-Up |  |  |  |  | SR |  |  | P |  |  |  |  |
| 1. Referral to Law Enforcement |  |  |  |  | S |  |  | P |  |  |  |  |
| 1. Regulatory Self-Disclosure | S | P |  |  | SR |  |  |  |  |  |  |  |
| 1. Civil Litigation |  |  |  |  | P |  |  | S |  |  |  |  |
| 1. Asset Recovery |  |  |  |  | S |  |  | P |  |  |  |  |
| 1. Monitor Recoveries |  |  |  |  |  |  | P | S |  |  |  |  |
| 1. Disciplinary Action |  |  | SR |  | S |  |  |  | SR |  |  |  |
| 1. Remediation / Corrective Action |  | S | SR | S | S | SR | S | SR | S |  | S |  |
| 1. Fraud Prevention / Detection Recommendations | S | S | S | S | S | SR | S | SR | S | S | S | S |
| 1. Publicity / Press Releases |  | S |  |  | S |  |  |  |  | P |  |  |
| 1. Proactive Fraud Auditing |  |  |  |  |  | P | S |  |  |  |  |  |
| 1. Internal Controls Review |  |  |  |  |  | P |  |  |  |  |  |  |
| 1. Case Analysis |  |  |  |  |  | S |  | P |  |  |  |  |
| 1. Fraud Risk Reporting |  | P | S | S | S | S | S | SR | S |  | S |  |
| 1. Fraud Risk Management Framework Assessment |  | SR |  |  |  | P |  |  |  |  |  |  |

**P (Primary Responsibility) S (Secondary Responsibility) SR (Shared Responsibility)**

\* Fraud Investigation Unit; \*\* Business Unit